United States Environmental Protection Agency
Region 1 – New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Certified Mail
Returned Receipt Required

DEC 2 3 2015

Harlan Billings
Billings Diesel and Marine Service, Inc.
P.O. Box 67
72 Moose Island Road
Stonington, ME 04681

Re: Request for Information Pursuant to Section 308 of the Clean Water Act (33 U.S.C. § 1318), Docket No. CWA-308-R01-FY16-05

Dear Mr. Billings:

On October 9, 2015 the U.S. Environmental Protection Agency, Region I (the "Region") conducted an inspection of the Billings Diesel and Marine Services Inc. facility located at 72 Moose Island Road in Stonington, ME (hereafter referred to as the "site" or "Facility"). The Facility was inspected for compliance with the Clean Water Act (the "Act"). The Region received a submittal from the Facility on November 6, 2015 regarding a number of observations that were made during the inspection.

Sections 308(a) and 311(m) of the Clean Water Act, 33 U.S.C. §§ 1318(a) and 1321(m) authorize the Environmental Protection Agency ("EPA") to require any owner or operator to provide information needed to determine whether there has been a violation of the Act. Accordingly, you are hereby required, pursuant to Sections 308(a) and 311(m) of the Act, 33 U.S.C. §§ 1318(a) and 1321(m) to respond to this Request for Information (the "Request) **within thirty (45) calendar days of receipt of this letter**. Please read the instructions in Enclosure 1 carefully before preparing your response and answer each question in Enclosure 2 as clearly and completely as possible.

Your response to this Request must also be accompanied by a certificate that is signed and dated by the person who is authorized to respond to the Request. A Statement of Certification, Enclosure 3, accompanies this letter.

Information submitted pursuant to this Request shall be sent by certified mail, and shall be addressed as follows:

United States Environmental Protection Agency, Region I
5 Post Office Square, Suite 100

Boston, MA 02109-3912
Attention: Alex Rosenberg (OES 04-4)

and

Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017
Attention: Pam Parker

Compliance with this Request is mandatory. Failure to respond fully and truthfully or to respond within the time frame specified above also constitutes a violation of the Clean Water Act subject to enforcement action, including the assessment of penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal prosecution under 18 U.S.C. § 1001.

The Small Business Regulatory Enforcement and Fairness Act ("SBREFA") provides small businesses the opportunity to submit comments on regulatory enforcement at the time of an EPA enforcement action. The enclosed Information Sheet contains information regarding their rights, and describes compliance assistance that may be available to you. The Small Business Ombudsman may be reached at 1-800-368-5888. EPA routinely provides this information to businesses whether or not they qualify as small businesses, as defined by the Small Business Administration. Please be aware that availing yourself of this opportunity does not relieve your facility of its responsibility to comply with applicable federal and state laws and regulations.

The company may assert a business confidentiality claim with respect to part or all of the information submitted to EPA in the manner described at 40 C.F.R. Part 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is submitted to EPA, the information may be made available to the public by EPA without further notice.

If you have questions regarding this Request, please contact Alex Rosenberg of my staff at 617-918-1709, or have your attorney contact Rohemir Ramirez Ballagas, Enforcement Counsel, at 617-918-1262.

Sincerely,

James Chow, Manager
Technical Enforcement Office
Office of Environmental Stewardship

Enclosures

Cc: Jana Wood, Maine Department of Environmental Protection
Alex Rosenberg, EPA Region 1
Rohemir Ramirez Ballagas, EPA Counsel

Enclosure No. 1

Information Request Instructions

1. Please provide a separate narrative response to each and every question and subpart of a question set forth in this Request. Precede each answer with the text and the number of the question and the subpart to which the answer corresponds.

2. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, please explain.

3. Any documents referenced or relied upon by you to answer any of the questions in the Request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the question and subpart to which they are responding. If the documentation that supports a response to one item duplicates the documentation that supports another item, submit one copy of the documentation and reference the documentation in subsequent responses.

4. If information or documents not known or not available to you as of the date of the submission of the response to this Request for Information should later become known, or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is inaccurate or incomplete, you must notify the EPA of this finding as soon as possible and provide a corrected response.

Enclosure No. 2

Respond to the Following Questions

I. General Business and Ownership Information Questions:

a. Specify the full legal name, with exact spelling, and the business mailing address and telephone number of Billings Diesel and Marine Service, Inc. ("Billings"). Specify the state of incorporation and the principal place of business. List all of Billings' parent and subsidiary corporations' names and addresses.

b. Specify the entity or entities that own or have owned Billings from May 1, 2011 to the present. If any transfer of ownership has occurred, specify the owner(s) prior to and following the transfer and the date of transfer.

c. Provide a flow chart/diagram that illustrates the corporate and management structure of Billings and its subsidiaries. Identify who has responsibility for environmental compliance within Billings both currently and since May 1, 2011.

d. Provide a list of all facilities with addresses throughout New Hampshire, Vermont, Maine, Massachusetts, Connecticut and Rhode Island ("New England") that are subsidiaries of, or affiliated with, Billings.

e. For each facility listed in response to (d) above including Billings in Stonington, ME, please provide the following information:

(1) the Standard Industrial Code(s), specifying the primary SIC code;

(2) The date each facility first began operation and, if different, the date the current owner took over ownership of each facility;

(3) If a facility is operated by an entity other than the owner, include the name of the current operator and the date the operator took over operation of that facility; and

(4) A description of the industrial processes that are carried out at each facility.

II. Provide a separate response to the following questions for the Facility.

General Industrial Stormwater Questions:

a. Describe and list all industrial activities[1] that have taken place from January 1, 2011 to the present; include the period of time and dates during which the activities occurred.

(1) State which industrial activities are exposed to stormwaters. If the activity is not exposed to stormwaters, describe the measure which prevents the activity from being exposed, i.e., roof assembly, tarpaulin, fixed or portable structure, drainage systems, etc.

(2) For industrial activities conducted outside, describe all specific source control measures, best management practices ("BMPs") and/or structural controls that were or are currently being used to minimize the activity's exposure to stormwaters.

b. If there have been any modifications to the Facility's industrial activities that are exposed to stormwater, industrial activity source control measures, best management practices and/or structural controls from January 1, 2011, to the present, describe the conditions prior to each change, the nature of each change, and the date when each change was implemented. Also, specify the reason why the change was made.

c. In detail, list and describe each stormwater discharge to surface water or wetlands, and its ultimate discharge location. Provide an estimate or, if available, an actual volumetric flow rate (in gallons per month) from each discharge, and the minimum rain storm intensity event(s) that will produce a stormwater discharge.

d. For each of Billings' stormwater discharges to surface waters or wetlands, state the name of the receiving surface waters or wetlands. If stormwater is not discharged directly to surface waters or wetlands (i.e., collected in a detention basin, swales, catch basins, or garage bays), describe the pathway of the stormwater flow including the immediate and ultimate destinations and the means of conveyance. If the discharge of stormwater has changed since January 1, 2011, provide a description of the changes and include the period of time and dates when the discharge changed.

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[1] *For the purpose of this letter, an "industrial activity" includes, but is not limited to pressure washing, bottom washing, abrasive blasting, grinding, sanding, scraping, outdoor manufacturing or processing activities (e.g., welding, metal fabricating, repairs and maintenance), painting, dry-dock cleaning, solvent mixing, loading or unloading, locations used for the treatment, storage or disposal of wastes; liquid storage tanks; liquid storage areas (e.g., paint, solvents, resins), material storage areas (e.g., blasting media, aluminum, steel, scrap iron), vehicle and equipment repair/ servicing, washing, cleaning and maintenance, and, fuel-oil loading and unloading, etc.*

e. Specify the primary and secondary standard industrial classification (SIC) codes for the facility.

f. For the period from January 1, 2011 to the present, provide the average number of boats washed, sanded and re-surfaced, painted or had exterior welding work conducted per week on any marine rail or within any area that is exposed to stormwater. Additionally, provide the following information;

(1) Indicate the number of months since January 1, 2011 during which at some point a boat or multiple boats were either washed, sanded, re-surfaced, painted or had exterior welding work conducted on the marine rail lift located in the Rockefeller Building;

(2) Indicate the number of months since January 1, 2011 during which at some point a boat or multiple boats were either washed, sanded, re-surfaced, painted or had exterior welding work conducted on the marine rail lift located in the New Building; and

(3) Indicate the number of months since January 1, 2011 during which at some point a boat or multiple boats were either washed, sanded, re-surfaced, painted or had exterior welding work conducted on the marine rail lift located outside next to the boat wash pad and stormwater Outfall 2.

a. Describe any and all BMPs implemented on this working area in order to contain the discharge of pollutants during dry weather and wet weather events.

b. During the October 9, 2015 inspection EPA was notified that the Facility implements a BMP that is to lay out a series of tarps beneath the boat that is being maintained or repaired upon the marine rail lift located outside. Describe the procedures for managing accumulated deposits on the tarp prior to and or during a wet weather event.

g. Provide the daily operating hours, number of days the facility conducts industrial activities per week, and the number of employees at the Facility on a yearly basis, showing the high and low season separately.

h. Provide a copy of each individual application and each signed and dated Notice of Intent ("NOI") form, and all related correspondence, used to obtain stormwater permit coverage under the MEDEP's October 11, 2005, and April 26, 2011, Multi-Sector General Permits for Stormwater Discharges from Industrial Activities, ("2005 MSGP" and "2011 MSGP" respectively).

i. Provide a copy of the original and subsequent permit or permit authorization notice and the permit number(s) and dates of coverage.

j. State the date when the Facility's first Stormwater Pollution Prevention Plan ("SWPPP") was prepared and the date(s) of any subsequent revisions. Submit the past two final and draft SWPPPs.

k. Provide a detailed site diagram that meets the conditions set forth in Part V.D.3 of MEDEP's 2011 MSGP. The diagram shall clearly illustrate and label:

(1) Approximate drainage boundaries including directions of stormwater flow and outfall locations (use arrows to show flow path);

(2) Means by which stormwater flows off the site, i.e., pumped or gravity;

(3) Boundary of impervious surfaces;

(4) Drainage diversion and control structures (i.e., detention basins and catch basins, outfall structures and drainage swales, etc.) in place to reduce pollutants discharged off the site;

(5) Location of all existing structural BMPs to reduce pollutants in stormwater runoff;

(6) Location of surface waters including wetlands and streams;

(7) Identify areas where the following may be exposed to stormwater: fueling; engine maintenance or repair; vessel maintenance or repair; pressure washing; painting; sanding; grinding, blasting; welding; metal fabrication; loading or unloading areas; locations used for the welding; metal fabrication; loading or unloading areas; locations used for the treatment, storage or disposal of wastes; liquid storage tanks; liquid storage areas (e.g., paint, solvents, resins); and, material storage areas (e.g., blasting media, aluminum, steel, scrap iron); and

(8) Industrial activities which generate process wastewaters and ultimate discharge locations of each respective activity.

l. Provide the following documents and information in chronological order for the period from January 1, 2011 to the present:

(1) *Site Compliance Evaluations* conducted under Part IV.K. in the 2005 MSGP, and Part V.I. in the 2011 MSGP. If inspections have not been conducted and documented, explain why they were not conducted or documented;

(2) *Quarterly Visual Monitoring* conducted under Part V.A.1. in the 2005 MSGP, and Part VI.B. in the 2011 MSGP. If inspections have not been conducted and documented, please explain why they were not conducted or documented;

(3) *Monthly Inspections* conducted under Part R.4.e. in the 2005 MSGP, and Appendix R.C.4. in the 2011 MSGP. If inspections have not been conducted and documented, explain why they were not conducted or documented;

m. For the period from January 1, 2011 to the present provide the name and credentials for all personnel who have been designated by Billings as being qualified to oversee Billings' SWPPPs and conduct stormwater related inspections. Provide employee training records as required under Part IV.F.7.b.i. in the 2005 MSGP, and Part V.D.9.a and Appendix R.C.7. in the 2011 MSGP. If individuals identified are not qualified and/or have not been trained to oversee the Billings' SWPPP and/or conduct stormwater related inspections, explain the reasons for these deficiencies.

General Industrial Process Wastewater Questions:

n. Identify and list all unit operations[2] that either generate process or sanitary wastewater or have the potential to discharge pollutants directly into a water of the U.S.:

(1) For each identified unit operation, provide the ultimate discharge point, and an estimated or actual daily maximum and monthly average flow rate (in gallons or lbs of pollutant) for each discharge;

(2) For the two areas within the New Building where boat maintenance, repair and storage take place (in front of the marine rail and in the section of the building that is parallel to the marine rail) provide the following information (areas shown in slides 19 & 20 (Area A), 22 & 23 (Area B)) of attached photo album). Where appropriate provide a separate response to each of the following questions for each of the two respective areas:

(i) A description of the operations that take place within the area;

(ii) The type of drainage and the ultimate discharge point of that drainage;

(iii) A detailed description of the conveyance path for all floor drains. For Area B: have the description also include the conveyance path that leads to the drain outlet shown in slides 30 and 31. Explain under what circumstances is the plug removed to facilitate discharge of water as well as the source of the water that is shown to be wetting the right corner of the concrete inlet where the drain pipe is located (see slides 30 and 31).

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[2] *For the purpose of this letter, an "operation" is an industrial process such as, but not limited to, equipment cleaning and rinsing, sanding, blasting and painting, pressure washing, engine maintenance and repair, fueling, paint and solvent mixing, and disposal of process/bilge water streams from vessels and/or building and floor washing, floor drains, etc.*

(iv) Billings' standard protocols for disposing of waters collected during the generation of process waters in these areas. If no standard protocol exists, please explain what has been done in the past and draft and submit a standard operating protocol for the future;

(v) Average number of times floor has been washed and or industrial processes have created a wastewater on the floor per week since January 1, 2011 to the present.

a) Describe the source of water used to clean the floors. Include in the description an explanation of the source of water for the hose shown in slide 29. If the hose is used for additional purposes besides cleaning the floors, list its other uses.

b) What is the average volume of water that is used to clean the floor in each area;

c) Where on the property is wash water discharged or collected; and

d) Usual viscosity of wash water.

(vi) All documentation about waters generated within the area (i.e. flow volumes, pump records, dates, etc.);

(3) Provide a copy of all permits issued to Billings for process wastewater discharges, and all analytical monitoring results of discharged process wastewaters in chronological order for the period from January 1, 2011 to the present;

(4) Describe all pretreatment pollution control equipment (i.e., settling tanks, catch basins, and sedimentation or filtering media) along the wastewater flow path from the unit operation's source to its ultimate discharge location;

(5) State the general practice or standard operating procedure for the use of the boat washing water collection system;

(i) Describe what efforts and on what frequency those efforts are taken to ensure that paint chips and sediments are removed from the drain after washing;

(ii) State all methods used to clean the drain;

(iii) State the frequency at which the drain is cleaned by each method of cleaning;

(iv) State on how many occasions since January 1, 2011 has the drain been unable to capture all of the related process wastewater from boat washing activities and the reason why (ie. system capacity, flow rate, etc.);

(v) Identify the location and water body where water that spills over the drain is ultimately discharged.

(6) If there have been any modifications to the Facility's process wastewater flows from January 1, 2011 to the present, please describe, in detail, with dates for each of those modifications;

(7) For each identified unit operation which generates a process wastewater, identify the exact location and drainage area where the operation is conducted. In addition, explain the hydrological path of flow from each process wastewater operation(s) from January 1, 2011, to the present. Explain in detail all locations where there may have been or continues to be a potential for process wastewater to discharge from the Facility to surface waters.

Other Question(s):

o. Provide a date and documentation that demonstrates how and when the drains in the floor drains in the New Building – Area B have been sealed.

p. The railway bottom washing plan submitted to the Region on November 6, 2015 indicates that the collection system is planned to be implemented on two marine railways. Explain what the Facility plans to do for the third marine railway lift and indicate specifically which of the three marine railways are (Rockefeller, New Building or outdoor) the plans are intended for.

a. The plan includes a proposed practice to control the discharge of bottom-wash process waters via a sump and pump collection system that is to be utilized at low-tide. Explain the Facility's plans for implementation of control measures and BMPs to minimize the pollution potential from industrial activities besides bottom washing that are conducted on the outdoor marine railway (i.e. use of vacuum sanders, stormwater collection system for capture of pollutant generated during high-tide water level, good housekeeping, etc.).

q. Provide a detailed history of the sand blasting areas in terms of past and present stormwater pollution control measures. Include dates of installation for any control measure (i.e. rip rap gravel curtain) and any methods used to ensure the functionality of the control measures. Reference any pertinent inspection and or monitoring records from previous responses above (i.e. SWPPP documentation).

a. For the period from January 1, 2011 to the present, provide the average number of boats sand blasted or otherwise worked on in the sand blasting area per week. If the average number is below 1, provide the estimate of average number per month.

b. Describe any future modifications to stormwater pollution control measures in the sand blasting area based on observations by EPA during the October 9, 2015 inspection of preferential flow paths being present in the flow under the small gravel curtain that is on top of the larger coastal rip-rap berm (see slides 67 & 68).

III. SPCC Questions

r. Submit a copy of a new or revised/amended SPCC Plan. If completion of an SPCC plan is not feasible within 45 calendar days, submit a detailed schedule of when it will be completed and fully implemented. The schedule should include the name, address, license number, and state licensure of the registered professional engineer certifying the SPCC Plan, if necessary. If the SPCC Plan calls for the construction of secondary containment at the Facility, the schedule should include construction milestone date.

s. Under 40 C.F.R. § 112.2, "oil" is defined as oil of any kind or in any form including, but not limited to, petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil. Provide the Material Safety Data Sheets for all resins used in boat repair and maintenance at the Facility (including but not limited to STYPOL 040-4219 unsaturated polyester resin in mono – see slides 44, 58 & 59). Provide an explanation of how the storage containers for all products that are chemically defined as an oil will have secondary containment and if necessary a date by which the Facility plans to construct the required containment.

t. Provide the date the Facility first started having the capacity to store oil above the SPCC regulatory thresholds set forth in 40 C.F.R. § 112.1(d)(1) (i.e., the SPCC-regulated underground oil storage capacity of the Facility is greater than 42,000 gallons -or- the aboveground oil storage capacity of the Facility is greater than 1,320 gallons).

u. For each additional facility listed in response to question I.d. above, please provide the following information:

(1) Provide the aggregate shell capacity of all above ground oil tanks and containers equal to or greater than 55 gallons in size at each facility.

(2) Explain whether each additional facility is subject to the Oil Pollution Prevention regulations (40 C.F.R. Part 112).

(3) For those facilities that are subject to the Oil Pollution Prevention regulations indicate whether the facility has a written, Professional

Engineer-certified SPCC Plan or a written, self-certified SPCC Plan, and whether the SPCC Plan is being fully implemented at the facility; and

(4) For facilities that are required to have an SPCC Plan but either do not have one or are not fully implementing their SPCC Plan, provide a time frame for when each facility is expected to be in compliance with the Oil Pollution Prevention Regulations.

v. Provide the following information regarding the steps to come into compliance with SPCC regulations after the October 9, 2015 inspection by EPA:

(1) The cost of amending the SPCC Plan;

(2) The cost of implementing the SPCC Plan (including the cost of the new above ground storage tank behind the Paint Shop and any additional work completed); and

(3) The ongoing annual costs of implementing the SPCC Plan (including training, inspections and record keeping).

End of Questions

Enclosure No. 3 - Statement of Certification for Billings Diesel and Marine Services Inc.

(To be returned with Response to Information Request)

I declare under penalty of perjury that I am authorized to respond on behalf of Billings Diesel and Marine Services Inc. I certify that the foregoing responses and information submitted were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By _____
(Signature)

_____
(Print Name)

_____
(Title)

_____
(Date)

United States Environmental Protection Agency
Region I - EPA New England
5 Post Office Square
Boston, MA 02109-3912

Drafted Date:	11/02/15
Finalized Date:	11/13/15
Subj:	Inspection Report – MSGP/SPCC Billings Diesel and Marine Services Inc.
From:	Alex Rosenberg
Thru:	Denny Dart
To:	File

I. Facility Information

A. Facility Name: Billings Diesel and Marine Services Inc.

B. Facility Location: 72 Moose Island Rd
Stonington, ME 04681

C. Facility Contacts: Mr. Harlan Billings, Owner
207-367-2328
Mr. Jim Foley, Environmental Manager
carpentry@billingsmarine.com

D. NPDES ID Number: MER05B837 (Sector R (SIC 3732) & Sector Q (SIC 4493))

II. Background Information

A. Date and time of inspection:

Facility entrance: October 9, 2015, 900 AM

Facility exit: October 9, 2015, 1:00 PM

B. Weather Conditions: Cloudy turned from light rain to heavy rain toward tail end of inspection ~ 50 deg F.

C. US EPA Representative(s): Alex Rosenberg

D. State/Local Representative(s): none

E. Federally Enforceable Requirements Covered During the Inspection:

MEPDES MSGP Permit (October 11, 2005 and April 26, 2011), SPCC Regulations.

III Type and Purpose of Inspection

Inspection by Environmental Protection Agency ("EPA") inspectors was a compliance evaluation inspection to evaluate compliance with the facility's Maine Pollutant Discharge Elimination Service

("MEPDES") multi-sector general permit ("MSGP" or "Permit") for stormwater associated with industrial activities as well as coverage and compliance with federal SPCC Oil regulations.

IV. Facility Description

Billings Diesel and Marine Services Inc., referred to here after as the "Facility" or "Billings" is a marina and boat storage and repair yard. According to carpentry foreman and environmental manager, Jim Foley, who accompanied the EPA Inspector, Alex Rosenberg, throughout the entirety of the inspection (with the exception of the closing interview), the business is run by the President of the company, Harlan Billings, and was established close to one hundred years ago. Alex Rosenberg presented his inspection credential to Jim Foley during the in-briefing. Some facts about Billings' business and operations at the Facility are as follows:

- Approximately 50 employees work at the Facility;
- Full service marina and boat maintenance and repair yard;
- Open all year; and
- Has a public fuel station and sewage pump out on the dock.

The Facility most recently applied for coverage under the 2011 MSGP Permit with its submittal of a Notice of Intent on April 27, 2011.

V. Inspection Findings

Permit Coverage

As explained in Part I.C of the Permit, a facility that is engaged in more than one Sector-specific industrial activity as described in Table 2 of the Permit, the owner operator must comply with Sector-specific requirements for each applicable industrial activity. The Facility's 2011 NOI identified Sector R, standard industrial classification code ("SIC" code) 3732 and Sector Q (Water Transportation), SIC code 4493 (Marina).

Good Housekeeping:

Appendix R.C.3 requires that measures used to prevent spent abrasives, paint chips and over spray be implemented to avoid discharging to receiving waters. Additionally it recommends consideration of containing blasting contaminants and or regularly cleaning stormwater conveyance systems.

The Stormwater Pollution Prevention Plan ("SWPPP") described that the Sand Blasting area was being reconfigured. Jim Foley confirmed the fact that the area was being redesigned but not in terms of the pollution control measure or good housekeeping practices, just in terms of grading a boat storage landing beside the blasting area which will have minimal effects on the blasting area itself. The SWPPP describes the control measure for containing sand blasting debris as a stone berm. In practice however the berm, constructed of an approximately 1 to 3 inch thick blanket of 1 inch in diameter rock on top of a tidal protection berm of approximately 1 foot in diameter rock (rip-rap), is highly permeable. Preferential (concentrated & discreet) flow paths were observed where stormwater is able to transport sand blast debris directly under the stone berm. Sediment deposits containing some paint chip residue were observed in these flow paths. (slides 66, 67, 68 slides reference the numbered pages of the attached Photo Album).

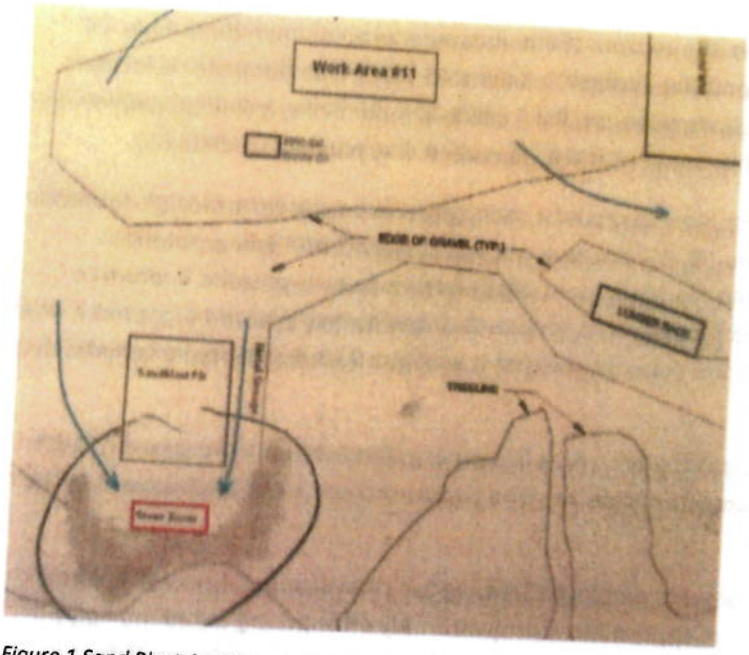

Figure 1 Sand Blast Area

Appendix Q.C.3 and Appendix R.C.3 (and more generally in Part V(D)(9)(a.)) of the permit require that if pressure washing is used to bottom wash vesselsthe generated process wastewater must be permitted by a separate MEPDES permit. The alternative being that the water is captured for reuse or disposal off-site.

The Facility has a bottom-wash recycling system. Vessels that are moved out of the water by the travel lift or trailer are brought on top of the dedicated washpad where wash water is collected in a single catchbasin (slides 4, 5, & 6). Water is pumped from the catchbasin into a recycle system (slide 7) that filters and then stores the water for reuse by the pressure washer. Any over-spray or runoff toward the ocean-side of the wash pad is filtered by a strip of stone spreader (slide 8) that has a layer of filter cloth material beneath it. According to Jim Foley the Facility changes out the filter fabric in this area every year.

According to Jim Foley, the catchbasin inside the wash pad is cleaned out on a daily basis when it has been used in order to mitigate any overflow of residual pollutants in the case of back-up due to a large rain-event. At the beginning of the inspection the lift had been in use. When the boat wash finished being cleaned, a trailer backed up onto the washpad to receive the boat that was still slung in the travel lift. The tires of the trailer became covered in paint residue and were therefore a potential source of tracking pollutants off the wash-pad. At the end of the inspection, after it had begun to rain, the pad still had residual paint on it from the boat which had been washed approximately 4 hours prior (slide 72).

Part V(D)(9)(a) of the Permit requires that non-structural BMPs be implemented to prevent stormwater pollution including, where practicable, minimizing the exposure of stormwater to any material that could contribute pollutants. Part V.D.4 requires the permittee to list all potential sources of pollution within their SWPPP.

Inspectors observed a dumpster whose cover was open. The dumpster contained used 1 liter oil containers and other miscellaneous trash (slide 14). There was an accumulation of oily water within the

dumpster. Approximately one inch above the bottom of the dumpster was an open drain-hole. Oil staining was visible on the gravel all around the dumpster. (slides 15 &16). The dumpster is located approximately 25 feet upgradient from stormwater outfall 2 (slide 16). Jim Foley asked an employee to seal the drain hole in the dumpster and by the end of the inspection it was plugged (slide 65).

An industrial fork-lift attachment used to move boats into their respective long-term storage locations was located next to the dumpster. (slides 16, 65) and was not listed in the SWPPP as a potential pollution source. Jim Foley explained that the equipment needed to be heavily greased in order to operate correctly. Alex Rosenberg asked if equipment such as this was normally covered or stored inside in anticipation of or during a rain event. Jim Foley stated that it was not. Alex Rosenberg explained that this was a potential source of pollution.

At the end of the inspection it began to rain heavily. Alex Rosenberg observed that the greased folk-lift device remained outside next to the dumpster (slide 71). The Facility did not list this equipment in their SWPPP as a potential pollution source.

Part V.D.9.a requires the permittee to provide employee training for all employees who work in areas where industrial materials or activities are exposed to stormwater. Alex Rosenberg asked Jim Foley if any of the employees would implement any modifications to or changes in their routine activities in anticipation of or during a rain event in order to mitigate stormwater pollution. Jim Foley answered no. Alex Rosenberg suggested that creating this type of pollution prevention mind-frame is one of the goals of the stormwater training permit requirement. Alex Rosenberg recommended labeling the outfalls to have employees begin to understand the potential flow paths of pollution sources.

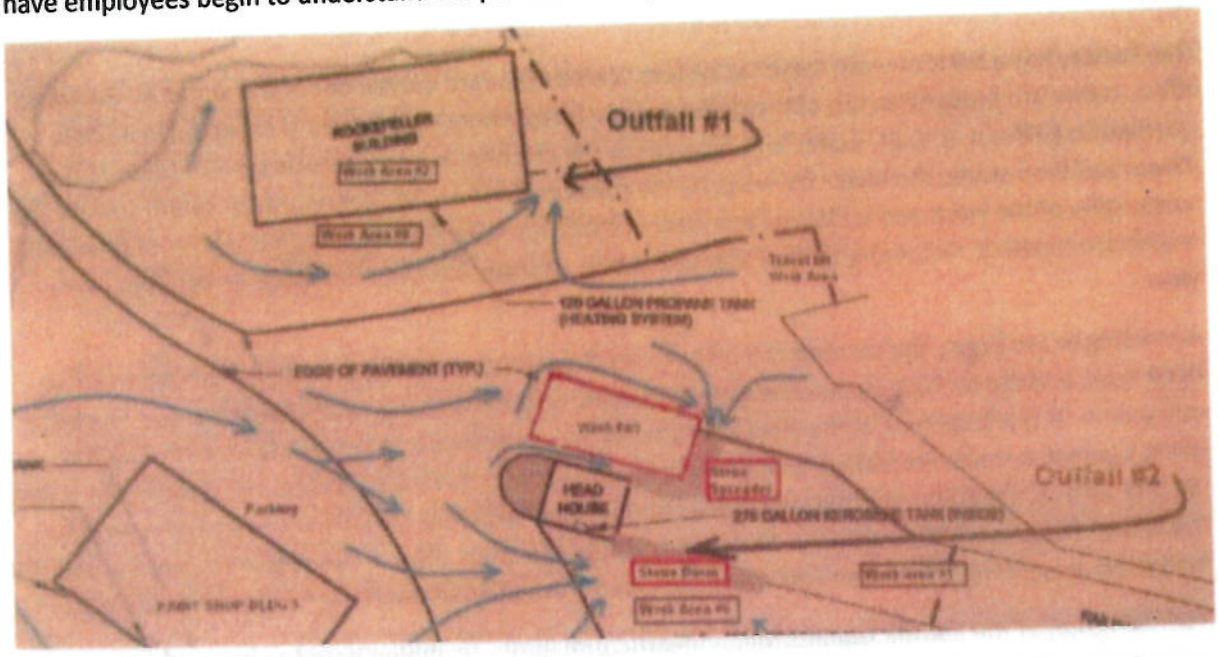

Figure 2 Railways/Washpad & Outfalls 1 and 2

Control Measures

Part V.D.9.b requires the permittee to implement structural BMPs to prevent erosion and sediment control and general stormwater pollution.

The Facility has stone berms at the edge of the ocean beside the wash pad and the Outfall 2. According to Jim Foley, filter fabric is located beneath the stone berm and is changed every few years as an additional practice to prevent the migration of fine sediments into the Ocean. (Slides 8, 13 and 16).

Jim Foley explained that an approximately 5 inch diameter sink hole through which stormwater flows out of outfall 1 recently appeared about 6 feet to the southwest of the outfall (slide 10). No attempt has been made to prevent the continuation or evolution of this erosional feature.

Spill Control

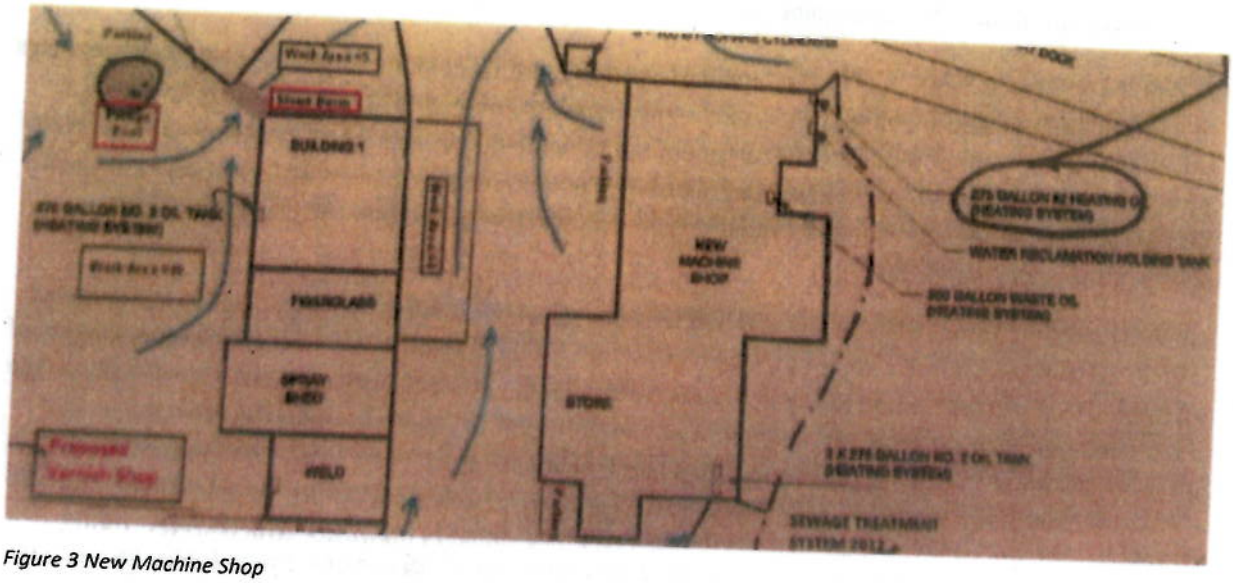

Figure 3 New Machine Shop

Non-stormwater Runoff

Part I.E.1 of the Permit states that stormwater discharges mixed with other non-authorized and non-permitted industrial process water discharges are prohibited. Part I.E.2 of the Permit states further that discharges of stormwater associated with industrial activity which require an individual waste discharge permit are prohibited.

Stormwater management controls as described in Appendix Q. Part C.5. of the permit include the requirement to clean oil water separators and sediment traps to ensure that spent abrasives, paint chips and solids will be intercepted and retained prior to entering the storm drainage system.

The SWPPP describes *work area 8* as being located inside the New Building. Inspectors observed evidence that the generation of industrial process waters or the potential to discharge pollutants directly into surface waters exist in three distinct areas of the New Building. Each area has the potential to drain water directly to surface water (the ocean).

The first area: Boat maintenance and repair activities are conducted on-top of the marine rail located inside the New Building (slide 19). Active repairs were observed on the deck of boat. Crates of metal and miscellaneous construction debris that had been generated from repairs inside the boat were on the edge of the marine rail. Some trash and debris were visible on the sand and gravel beneath the lift (slide 30). Jim Foley explained that when extensive exterior work is conducted the Facility creates a false deck surrounding the vessel using wooden boards and then lays tarps down. A permanent boardwalk is

located along both sides of the marine rail (seen in the bottom right corner of slide 29). At high tide ocean water extends all the way under the boat to location A in slides 19 and 20.

The second area: The cement floor just in front of the marine rail is utilized for boat maintenance and repair. Active repairs on a vessel were observed to be underway in this area (slide 20). The winch cables for the marine rail pass through this section of the cement floor. A grate protects the cable channel from work conducted and the channel is a direct conveyance path from this industrial process area to the ocean (slide 20 – location A). Alex Rosenberg observed sediments within the channel and pooled water on the cement floor in this area (slide 20).

The third area: The western half of the building is a large polished cement floor. Jim Foley explained that all types of general boat maintenance, repair and storage are conducted in this area. Alex Rosenberg observed a series of floor drains in this section of the New Building (slides 22-28). Alex Rosenberg asked if the drains were plugged. Jim Foley answered that all drains had been cemented. Alex observed what appeared to be an open drain pipe in one location and therefore asked that the drain covers be removed for closer inspection.

Jim was unable to remove the covers and had to request a staff member to bring tools to try and open them. The staff member almost bent a 6 inch crow bar trying to pry loose the hardened accumulation of sediments that existed around the drain covers. With a great amount of effort and hammering loose the sediments, the drain covers were removed. Two of the five drain pipes, beneath the drain covers had very lightweight plastic mushroom cap shaped hoods that laid above them and were approximately twice the diameter of the drain pipe itself (slide 28 looking through grate before being opened). The cap therefore hid from view the open end of the drain pipe but would in no way obstructs water from draining into the drain pipe. Within two of the drains there was evidence of wetness (slides 26 and 27).

The Facility could not identify the discharge points for the floor drain system and could not easily remove the drain covers for inspection. Sediments were either observed inside the drains or there was evidence of having had water recently pass through them. Evidence of wetness on the floor in this area was also observed (slide 23).

A water supply-line and hose were observed at location B (slides 22, 29) within the New Building (between the marine rail and their industrial process area described above). Before observing this hose, Jim Foley was asked the method of cleaning the floor in the building (i.e. where is the water supply). Jim Foley had explained that a hose was run from the bathroom in the carpentry shop under the corner of the door between the two activity areas and into the southern half of the New Building (slides 20 & 21) where the floor drains and marine rail are located. The polished cement floor was very clean throughout the New Building. After having located the water supply and hose at location B, Jim Foley said that he must be wrong about the source of water.

Alex Rosenberg then descended to the intertidal zone beneath the marine rail boardwalk to observe the foundation wall of the area that contains floor drains. A four inch drain pipe was observed extending out of the wall (slides 30 & 31). The concrete was observed to be wet along a crack that extended along the right hand corner of the drain pipe recession. The drain pipe was plugged and the plug was attached to a hook in the cement wall a foot above. Jim Foley indicated that he did not know the drain was there. Alex Rosenberg could not easily remove the drain plug, but observed that it was not permanent. Debris

and trash was observed on the sediment below the drain, under the boardwalk that surrounds the marine rail (see bottom of slide 30).

Part I.K of the permit explains that coverage under a general permit such as the MSGP may be issued for point source discharges of stormwater only, and that a separate and distinct permit is required for the direct or indirect discharge of pollutants to the water of the state.

Industrial process water has the ability to discharge from all three areas inside of the New Building. Alex Rosenberg recommended that a plug be utilized at the end of the winch channel and that the standard operating procedure be to clean out the channel at the conclusion of any maintenance activity that takes place in the space above the channel. The plug can then be temporarily removed when the winch system needs to operate. Alex Rosenberg also requested notification of the connectivity of all drains in the building and their final discharge location and to have the drains plugged. Furthermore, Alex Rosenberg recommended that a pollution control measure be implemented to capture any pollution from maintenance activities that are conducted on the marine rail.

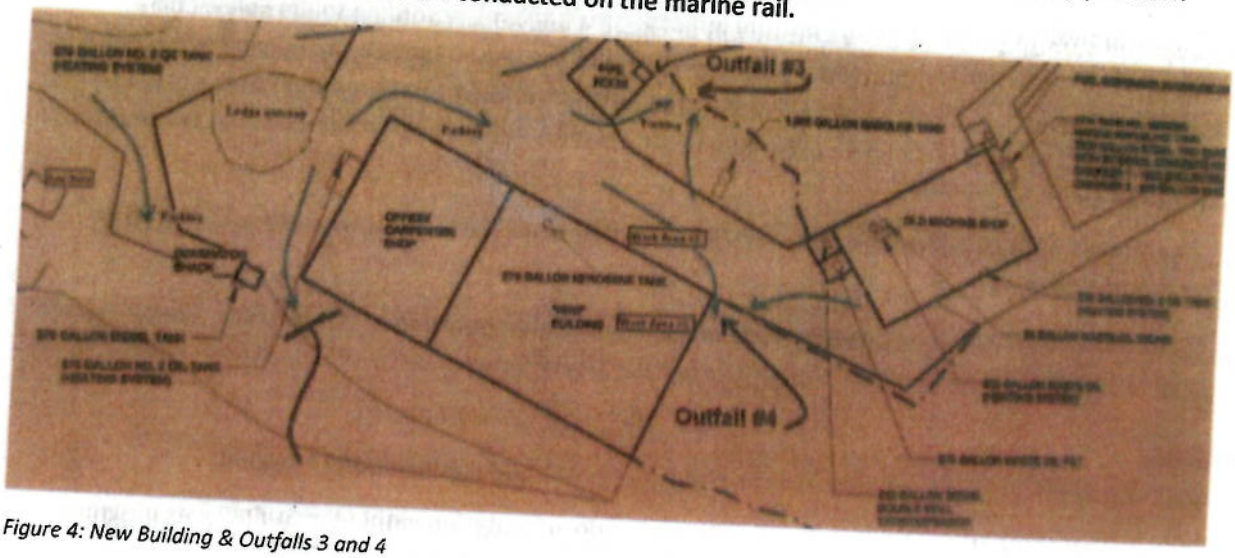

Figure 4: New Building & Outfalls 3 and 4

Two other marine rails are used at the Facility. The second covered rail (slide 11 – entrance, slides 69 & 70 inside) is located in the Rockefeller Building. The SWPPP describes the work that is conducted in this area as being within Work Area #2. Oil staining is visible on the ground surrounding the marine rail (slide 70).

The only uncovered rail is located beside the wash-pad and stormwater outfall #2 and is defined as Work Area #1 in the SWPPP (slide 9). Scrap metal pieces, from what Jim Folley described as recent work on the Coast Guard's ship, was observed in the water beneath the rail. Rust colored staining was visible on the sand and gravel beside and under the rail within the intertidal zone. Jim Foley explained that the one control measure that the Facility uses to contain pollutants is a system of tarps laid under the boat. Alex asked what, if any, the protocol was for removing the accumulated deposits that the tarp collects before a rain event. Jim answered that there was protocol for removing or cleaning the tarp before rain events. Alex Rosenberg recommended that the Facility institute a better level of control of pollutants beneath the rail systems in general.

SWPPP Contents:

Site Map

Part V.D.3 of the Permit lists the required elements that must be included on a Facility's SWPPP site map, including specifically boat ramps, an approximate outline of the area draining to each outfall (Part V.D.3.h) and the location and description of non-stormwater discharges such as process waters and licensed wastewater outfalls (Part V.D.3.i). Appendices Q and R (Part C.1.) list sector-specific activities such as painting, welding, metal fabrication, vessel maintenance and repair that are exposed to precipitation/surface runoff which must be included on the SWPPP map.

The Facility's SWPPP included a site map with a majority of the elements required by the permit. The Facility uses numbered work areas to reference in the narrative portion of the SWPPP what activities are undertaken at each location on the map.

Inspectors noted the following deficiencies with respect to SWPPP map contents. The building labeled "proposed varnish shop" (see the bottom left of Figure 4 above), according to Jim Foley, and as observed by the inspector during the site walk, the building has already been built and is therefore no longer "proposed". The contents of the 275 gallon oil tank in the northeast corner of the new machine shop has its contents mis-labeled. According to observations made on the site-walk the tank contains kerosene and not #2 diesel.

Boat ramps and covered railways are not labeled on the map. The primary boat ramp is labeled as "travel lift work area".

Approximate outlines of the area draining to each outfall are not included on the map. Blue arrows are used to identify the general direction of stormwater flow from a majority of the site (see figures above).

Signature

Part VIII.E of the Permit requires that the Facility's SWPPP and certifications be signed.

The annual comprehensive stormwater site review documentation within the SWPPP was unsigned.

The permit requires that the SWPPP contain a certification of non-stormwater discharge (Part V.J.12). Part V.I.2.f of the permit allows the annual non-stormwater certification to be included in the annual comprehensive site evaluations.

Alex Rosenberg observed that there was no date on the SWPPP's non-stormwater discharge certification and therefore deemed it impossible to know if the certification was being completed on an annual basis.

SPCC

The facility had an unsigned SPCC plan dated June 2011. The Plan was written by a certified engineer named Phil Ruck. According to Jim Foley, the Facility's maintenance supervisor Steve Snowden is responsible for implementing the SPCC plan. Steve was unavailable on the day of the inspection and therefore training and inspections records were unable to be located. During the site walk however, Alex Rosenberg observed that chronological lists of Steve Snowden's signature and date were written on the side of every tank (slides 17, 18, 32, 63, & 64), . Jim Foley explained that this was how Steve documented his tank inspections. No initials were observed on the 275 gallon kerosene tank outside of

the Paint Shop Building #5. (slide 62). This tank was rusted to a significant degree that the integrity of the secondary containment exterior was being close to failing.

Inspection initials were also not observed on any 55-gallon drums (slide 40), the Marine Refueling Tank, the fleet gas tank (slide 36 – AST#2), the portable storage tank (PST #1 – slide 42), or the waste oil tank in the New Machine Shop (slide 55 –AST#16).

Alex Rosenberg inspected every tank that was listed on the Facility's SPCC Plan in Table 2-1. The #2 diesel tank located in the Paint Shop was not listed in the SPCC plan, nor was the #2 diesel tank located in the head house. The only other discrepancy between the SPCC Plan's inventory of oil storage and what was observed in the field was the contents of AST's #15 and #17. Jim Foley stated that he would ensure the plan was updated to be consistent.

Piping exists between the oil storage tank (slide 36) that is used for fueling the Facility's fleet of vehicles and the Marine Refueling Tank located on the dock at the end of the Old Machine Shop (Slide 46). The piping is approximately 1 inch steel pipe (slide 36, 37, & 47). The purpose of the piping is to be able to transfer fuel to the Marine Refueling tank as make-up in case the Marine tank ever runs out. According to Jim Foley, this scenario rarely happens. The soundness of the piping's integrity and the potential of failure due to its alignment along the shore and down the side of the Old Machine shop was questioned by Alex Rosenberg.

Alex Rosenberg questioned Jim Foley if the 55-gallon drums of resin (slide 58, 59) would be considered an oil product and therefore would need to be listed within the SPCC Plan and have appropriate secondary containment. Jim said that he did not know. Both Alex and Jim said that they would look into it.

The secondary containment for the 300 gallon waste oil furnace tank (AST#16, slide 55) was full of 5-gallon pails and other items. Jim Foley states that in reality the sized secondary containment for any oil container located in the New Machine Shop is the floor drain system (slide 54, 56) that leads to a wastewater reclamation and treatment system (slide 53). Alex Rosenberg stated that the SPCC Plan could use more description on how the wastewater reclamation system would need to be run in the case of a catastrophic oil release to prevent a discharge of water. The fact that there are multiple steps between a release on the floor in the New Machine Shop and a liquid passing through the reclamation process, which itself doesn't directly discharge to the environment, gives a high level of confidence in the system functioning adequately as the primary means of secondary containment.

Out-Briefing

Inspector, Alex Rosenberg, met with Peter Grindle, the operations manager, for an exit interview. Harlan Billings, the Facility owner and company President joined the discussion when Alex Rosenberg was beginning to explain the Facility's need for pollution prevention controls along the marine rails. Peter admitted that the Facility hadn't implemented any new control measures since EPA had last inspected the site in 2011, at which point the same needs had been communicated by EPA inspector, Denny Dart. Harlan Billings stated that the Facility "does really have to do something about pollution controls on the marine rails." Both Peter and Harlan stated that the Facility has brainstormed about possible solutions to the issue of pollution prevention along the marine rails in the past, but have not ever solved the

problem due to the difficulty in implementing a control measure. Alex Rosenberg reiterated the need to implement a control measure. Alex explained that only once a control measure is being utilized is the Facility then able to evaluate its effectiveness and change or modify it as necessary. Not implementing a control measure and assessing its adequacy and modifying or changing it when necessary is not an option.

Alex Rosenberg also communicated the following recommendations and observations:

- Need for implementation of a stormwater pollution control measure at the sand-blasting location;
- Recommended improving the description of Above Ground Oil Storage tank containment within the New Machine Shop;
- Reviewed list of requirements and/or recommendations from the USEPA Region 1 SPCC Facility Information Form:
  - Update plan with new tanks
  - Make inspection records and training forms available to inspectors
  - Ensure piping from fueling tank to tank on dock is adequate and secure (rusty)
  - Implement secondary containment measures for the drums of used waste oil in the old machine shop.
- Need to determine the drainage point for the floor-drains in the New Building and to cement them up after discovering their interconnectivity.
- Recommended determining whether the resin used on boats and stored in 55 gallon drums is an oil product and therefore subject to secondary containment requirements.

Alex requested copies of the SPCC inspection records for piping and training.

Alex explained that one possible next step after the inspection is that EPA might send the Facility an information request letter.

Prior to the out-briefing, Jim Foley requested a copy of the inspection report.

USEPA REGION I
SPCC FACILITY INFORMATION FORM

Inspector's Name: Alex Rosenberg		FRP REGIONAL #	
Inspection Team Members: N/A			
Type of Inspection: SPCC[X] Follow-up Inspection [ ]			
Name of Facility: Billings Diesel & Marine Service INC.			
Facility Address: 72 Moose Island Rd.			
City: Stonington	County: Hancock	State: ME	Zip: 04681
Latitude:	Longitude:		
Nearest "Waters of the U. S.": Atlantic Ocean			
Facility Contact: Jim Foley	Title: Carpenter Shop Foreman Env. Safety Manager		
Facility Contact: 2. Peter Grindle	Title: operations manager		
Telephone Number: 207 367 2328			
Name of Owner/Operator: Harlan Billings			
Corporate Address: Same as above			
City:	State:	Zip:	
Corporate Contact:	Title:		
Telephone Numbers: 1.	2.		
Synopsis of business operations: Ship repair: storage marina			
Facility is: [ ] Unattended [ ] Attended [X] 8 hrs [ ] 24 hrs] [ ] Periodically [ ] Other (Specify)____			
How many employees at this Facility? 50			
If unmanned, number of employees needed to operate the Facility? N/A			

FACILITY STORAGE INVENTORY

ITEM	AMOUNT of TANKS	SHELL CAPACITY	PRODUCT	ITEM	AMOUNT of TANKS	SHELL CAPACITY	PRODUCT
1.	#1	2000		2.	#14	275	
3.	#2	1000		4.	#15	275	kerosene not diesel
5.	#3	275		6.	#16	300	
7.	#4	300		8.	#17	2×275	
9.	#5	275		10.	#18	275	
11.	#6	"		12.	#STG	275	
13.	#7	"		14.	SA #1	2×55=110	
15.	#8	"		16.	NEW #1	275	paint shop diesel
17.	#9	"		18.	NEW #2	275	head house diesel
19.	#10	"		20.			
21.	#11	"		22.			
23.	#12	"		24.			
25.	#13	"		26.			

Total Bulk Above Ground Storage: 9160 gallons

Total Bulk Below Ground Storage: Ø gallons

Total Oil-Filled Equipment Storage lifts ~200 gallons

Total Facility Oil Storage Capacity: ~10,000 gallons

64
275
× 18
2200
2750
5460
+ 110
5560
3600
1960

FACILITY DIAGRAM, REQUIREMENTS AND/OR RECOMMENDATIONS

- update plan w/ new tanks
- inspection record and training records available
- piping for gas transfer to dock tank rusty
- kerosene paint shop tank rusty
- description of containment for new machine shop in plan could be improved
- containment for drums of waste oil in old machine shop.
-

PATH TO NAVIGABLE WATERS

Describe one or more pathways that an oil spill might follow from the facility to "Waters of the United States." Identify if this information is provided in the SPCC.

d, Next to Atlantic Ocean

MEMORANDUM OF UNDERSTANDING

Check all applicable descriptions.

[X] Non-Transportation Related		[ ] Transportation Related	
[X] EPA	[ ] MMS	[ ] USCG	[ ] RSPA/OPS
[X] Onshore [ ] Off shore [ ] Drilling [ ] Production [ ] Refining [ ] In-plant processing [ ] Waste Treatment [ ] Storage [ ] Commercial [ ] Agriculture [ ] Industrial [ ] Public [ ] Load/Unloading [ ] Facility Piping	[ ] Drilling [ ] Production [ ] Storage	[ ] Vessel/shore transfer [ ] Oily ballast tanks [ ] Tank washings from vessels	[ ] Inline/ Breakout Tanks: (for continuous pipeline operation)
SPCC Part 112.1(b) [ ] Drilling	[ ] Producing [X] Gathering [X] Storing	[ ] Processing [ ] Refining [X] Transferring	[ ] Distributing [X] Consuming oil/oil products
Facility Type: [ ] Bulk storage [ ] Gas Station /Convenience [ ] Petroleum Distributor	[X] Industrial [X] Commercial [ ] Utilities [ ] Local Gov. [ ] State Gov. [ ] Federal (Non-Military)	[ ] Federal(Military) [ ] Air Taxi(Airline) [ ] Aircraft owner [ ] Auto Dealership [ ] Contractor [ ] Farm	[ ] Railroad [ ] Residential [ ] Trucking /Transport [ ] Trustee/Native American [ ] Other:

NOTICE OF SPCC INSPECTION WITH DEFICIENCIES
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Date: 10/8/15	Lead Inspector (Print Name & Sign): Alex Rosenberg	Inspection Number:
Additional Inspectors:		
Facility Name: Billings Diesel Marine	Facility Address: 72 Moose Island Causeway	Facility Type:
Facility Phone: 207-367-2328	Facility Email: office@billingsmarine.com	Facility Fax:

The purpose of the inspection process is to determine compliance with Section 311 of the Clean Water Act (the "Act"), 33 U.S.C. § 1321, and the Oil Pollution Prevention regulations found at 40 C.F.R. Part 112 (the "Regulations"). The scope of the inspection and plan review process may include, but is not limited to, reviewing and obtaining copies of documents and records; interviewing facility personnel; a physical inspection of the facility (including process areas); taking photographs or video; collecting samples; and other activities necessary to determine compliance with the Act and the Regulations.

Please review this Notice of SPCC Inspection with Deficiencies form ("Notice") *[and any attached documents]* carefully, as they identify deficiencies observed by the inspector. Please be advised that this Notice and any attached document(s) may not set forth all deficiencies with the Act and/or Regulations, and that an in-depth review of this Notice and any other relevant information may identify deficiencies not yet identified herein. Also note that the deficiencies noted are preliminary observations only, and this Notice is not a final determination of compliance or noncompliance.

Please also be advised that any noncompliance with the Act and/or the Regulations may constitute a violation for which penalties or other relief may be sought. Penalties may be assessed upon subsequent findings by a court of law or the Administrator that the facility has violated the Act and/or the Regulations. The United States Environmental Protection Agency ("EPA") reserves the right to initiate an enforcement action under the Act and any other applicable law, and to seek penalties and other appropriate relief, for any violation of the Act, the Regulations, or other applicable laws. This Notice and other relevant information will be reviewed by appropriate EPA personnel to determine if any of the deficiencies noted herein, or any additional deficiencies identified in such review, constitute violations of the Act and/or the Regulations and whether an enforcement action is appropriate. EPA will provide written correspondence describing any deficiencies identified during the subsequent inspection review process.

To the extent this Notice identifies deficiencies with the Act and/or Regulations, *[as specified in the attached Summary of SPCC Deficiencies]*, you are urged to correct such deficiencies as soon as possible. EPA requests you submit all information, as soon as possible, evidencing your correction of the noted deficiencies to:

Joseph Canzano, P.E.
U.S. Environmental Protection Agency
Region I Oil Spill Prevention Compliance Coordinator
5 Post Office Square, Suite 100, OES04-4
Boston, MA 02109-3912

If it is not feasible to correct the deficiencies within 30-days of the date of the inspection, immediately submit a detailed explanation and schedule indicating by when the noted deficiencies will be corrected. If you believe that your facility is not required to have an SPCC Plan, or is in compliance with the SPCC regulatory requirements, you may submit an explanation, supported by documentation, as to why the facility is not subject to the SPCC provision of the Oil Pollution Prevention regulations at 40 C.F.R Part 112 or meets its requirements within 30-days of the date of the inspection.

Confidential Business Information

For the information submitted to EPA, you may be entitled to claim it as Confidential Business Information (CBI) pursuant to the regulations set forth in 40 C.F.R. Part 2. If EPA determines the information you have designated meets the criteria in 40 C.F.R. § 2.208, the information will be disclosed only to the extent and by means of the procedures specified in 40 C.F.R. Part 2 Subpart B. Unless CBI is claimed, EPA may make the information available to the public without further notice to you.

Acknowledgement of Inspection

Signature of Facility Representative: Peter Grindle

Title of Facility Representative:

EPA Clean Water Act Inspection Photo Album

Inspector: Rosenberg, Alex

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Legend

Aerial Maps

Photo Direction (any color)
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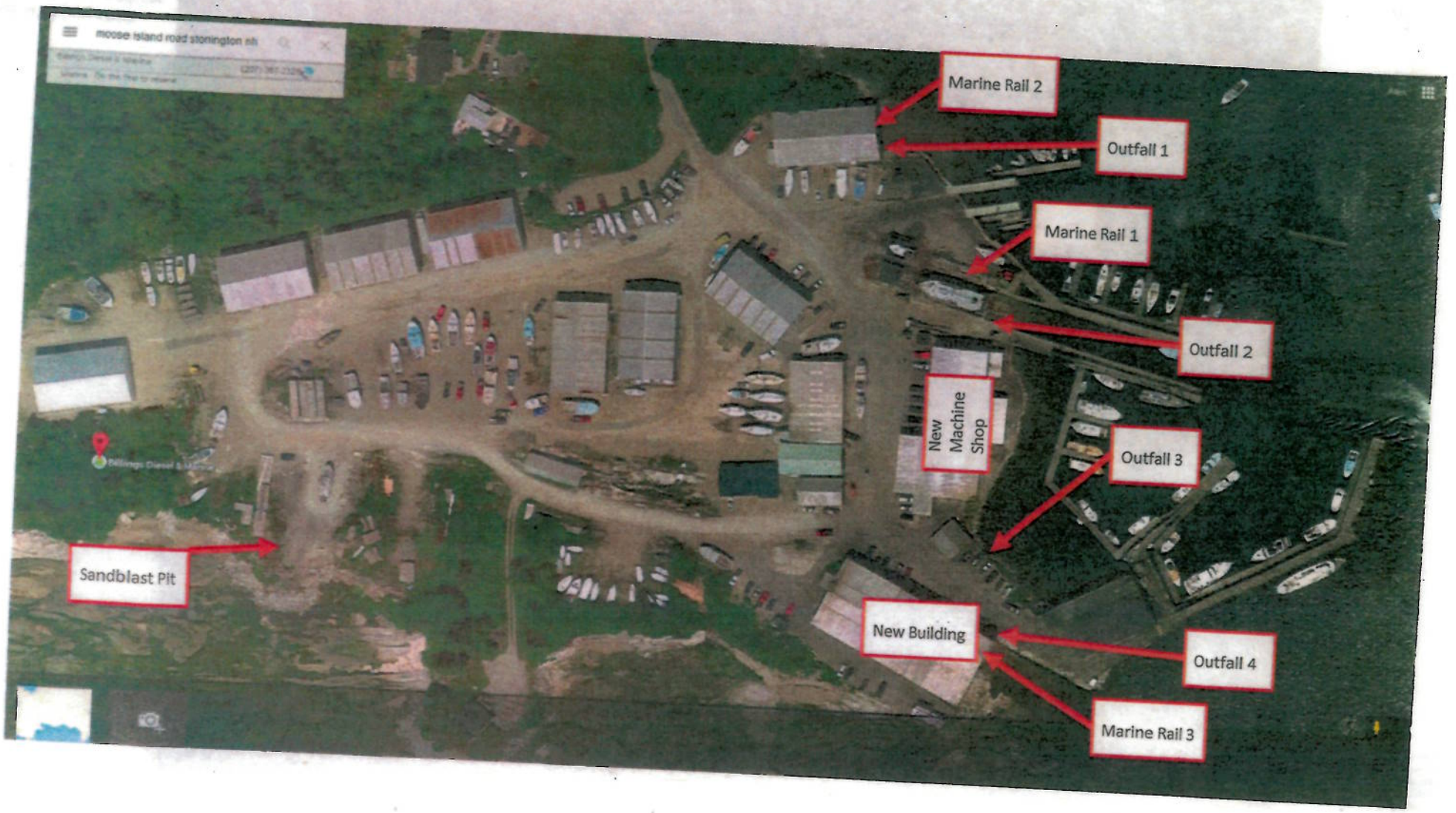
Property Boundary (any color)

Photo Annotation

Surface Water Flow Direction (any color)

Narrative Annotation/Comment (any color)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Outfall 1
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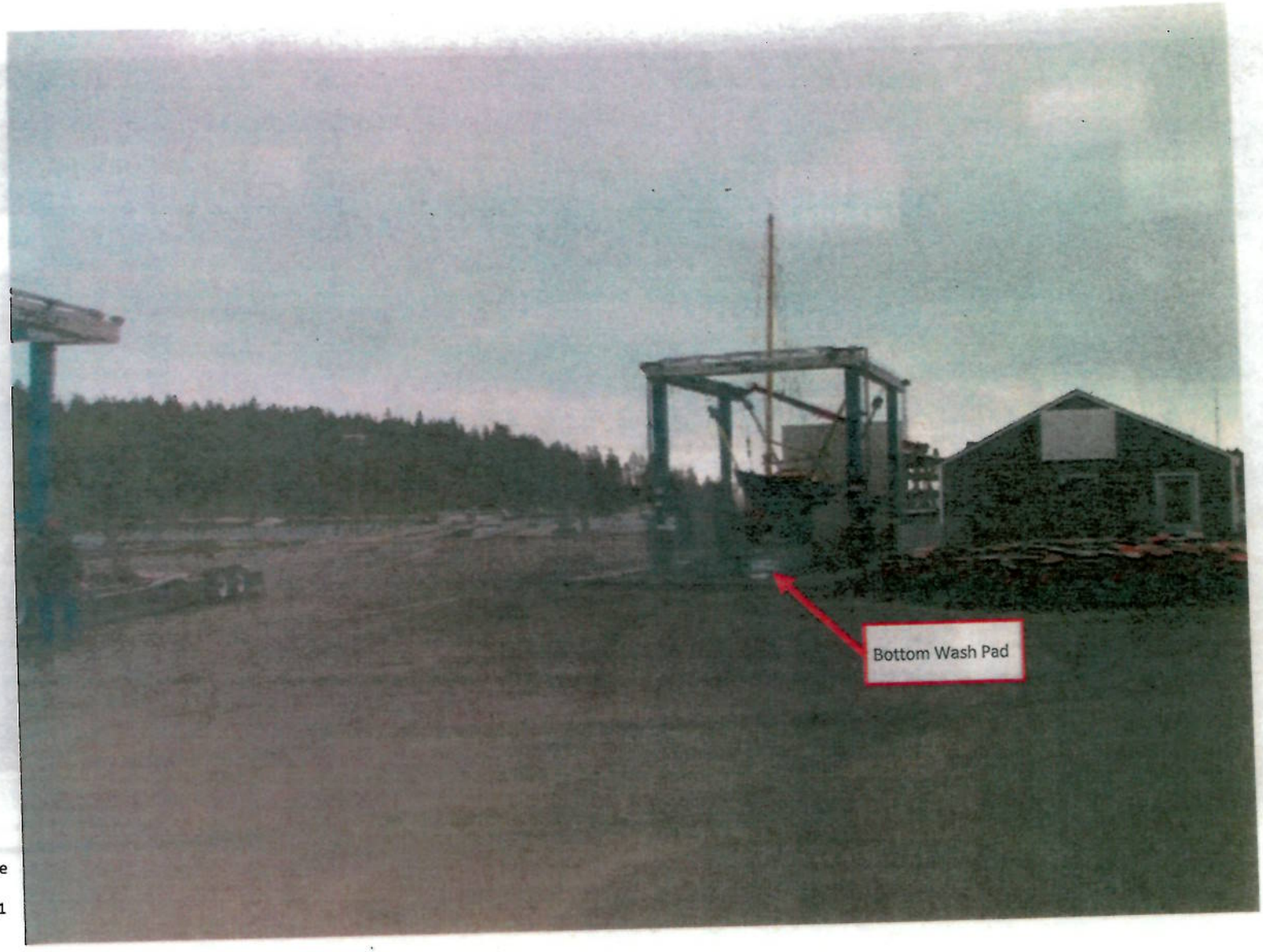
New Machine Shop
Outfall 3
Sandblast Pit
New Building
Outfall 4
Marine Rail 3



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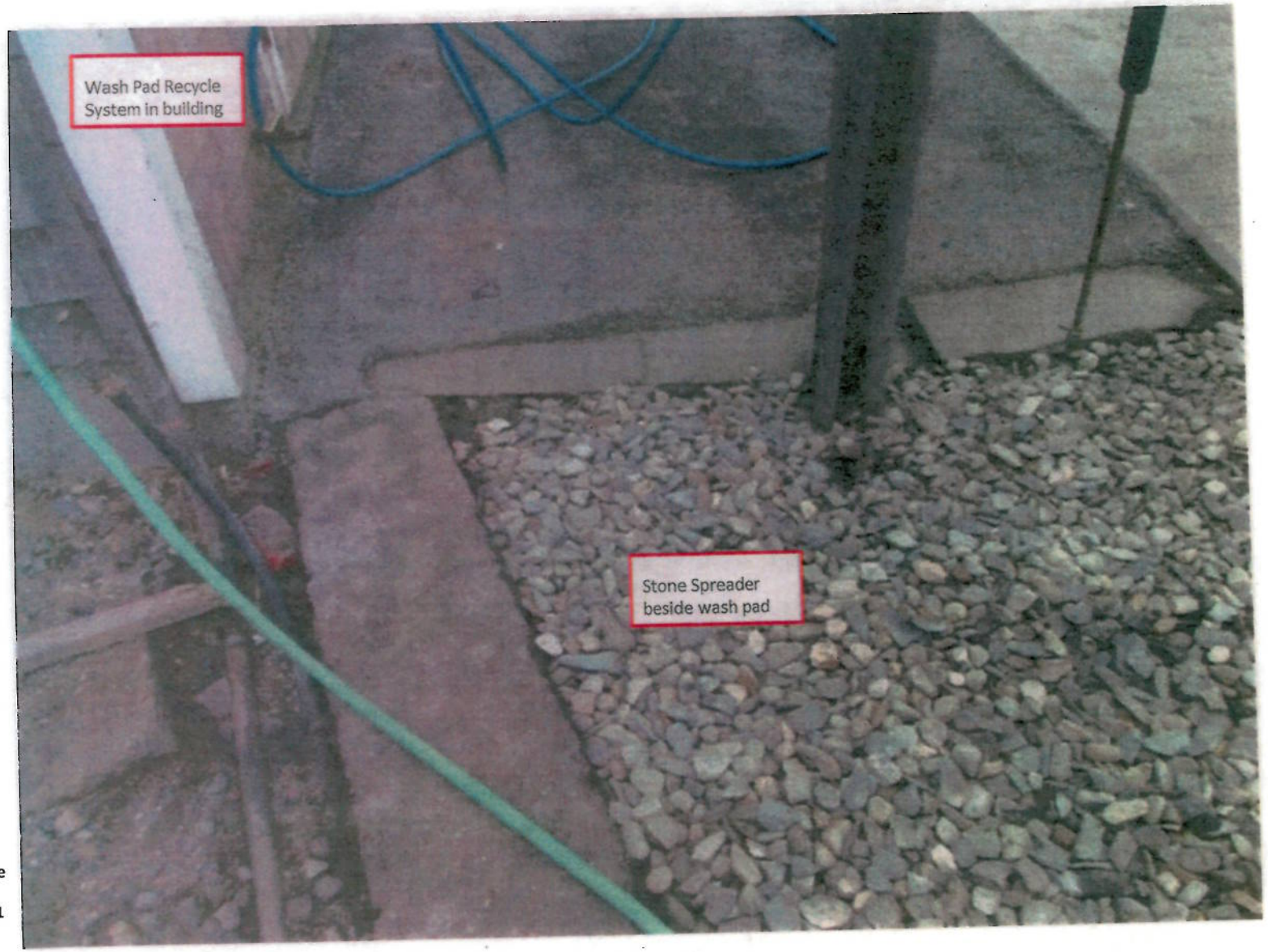

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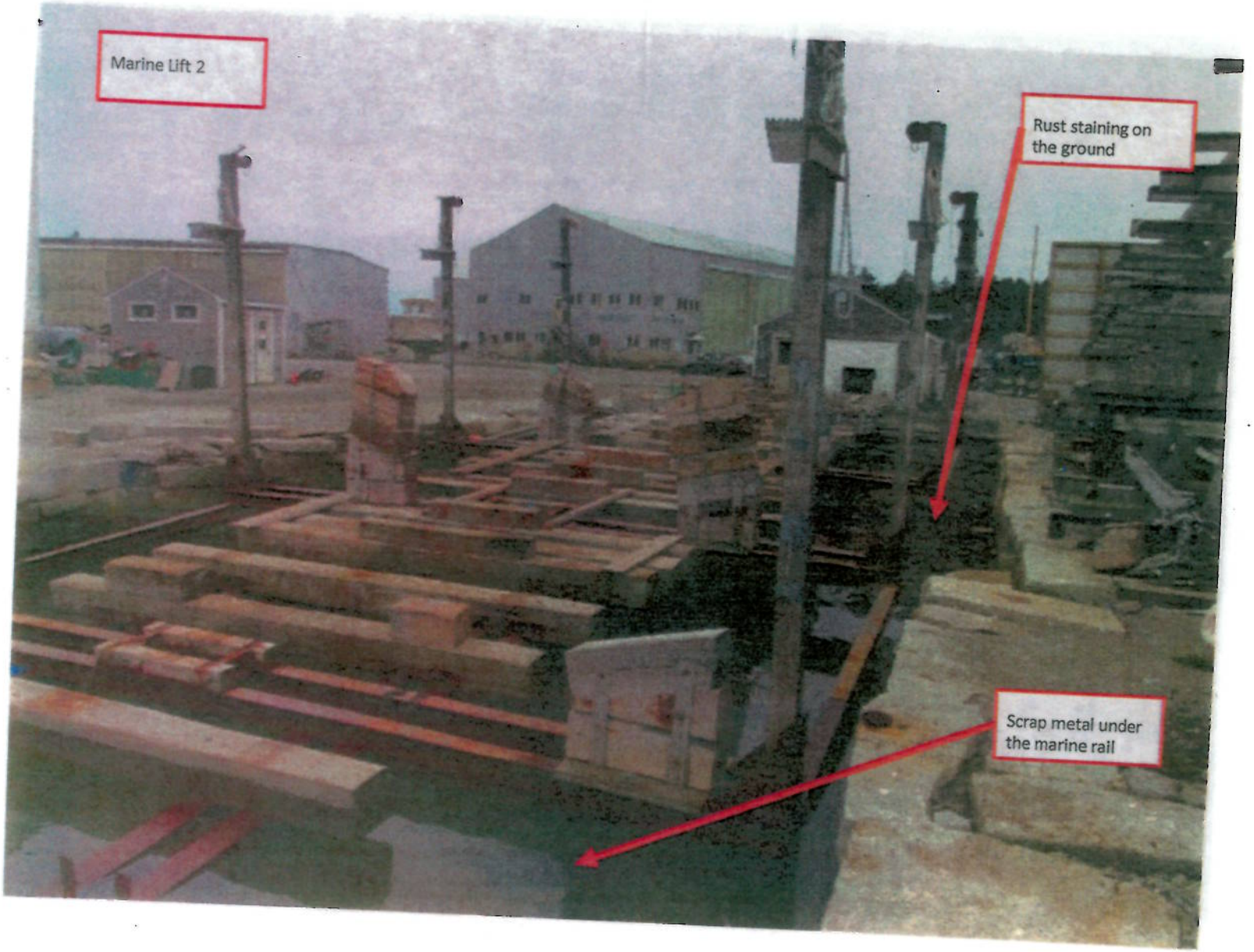

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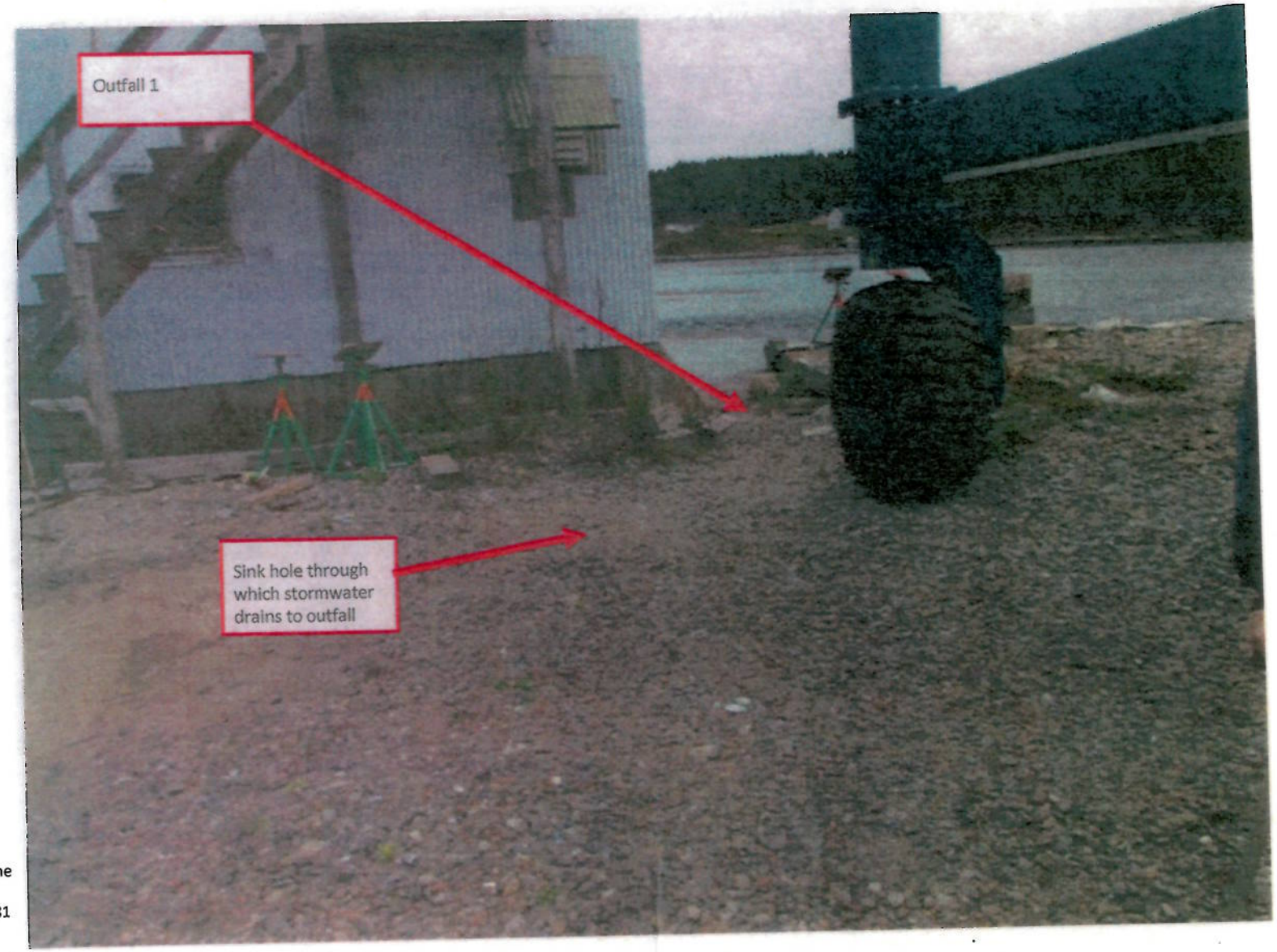

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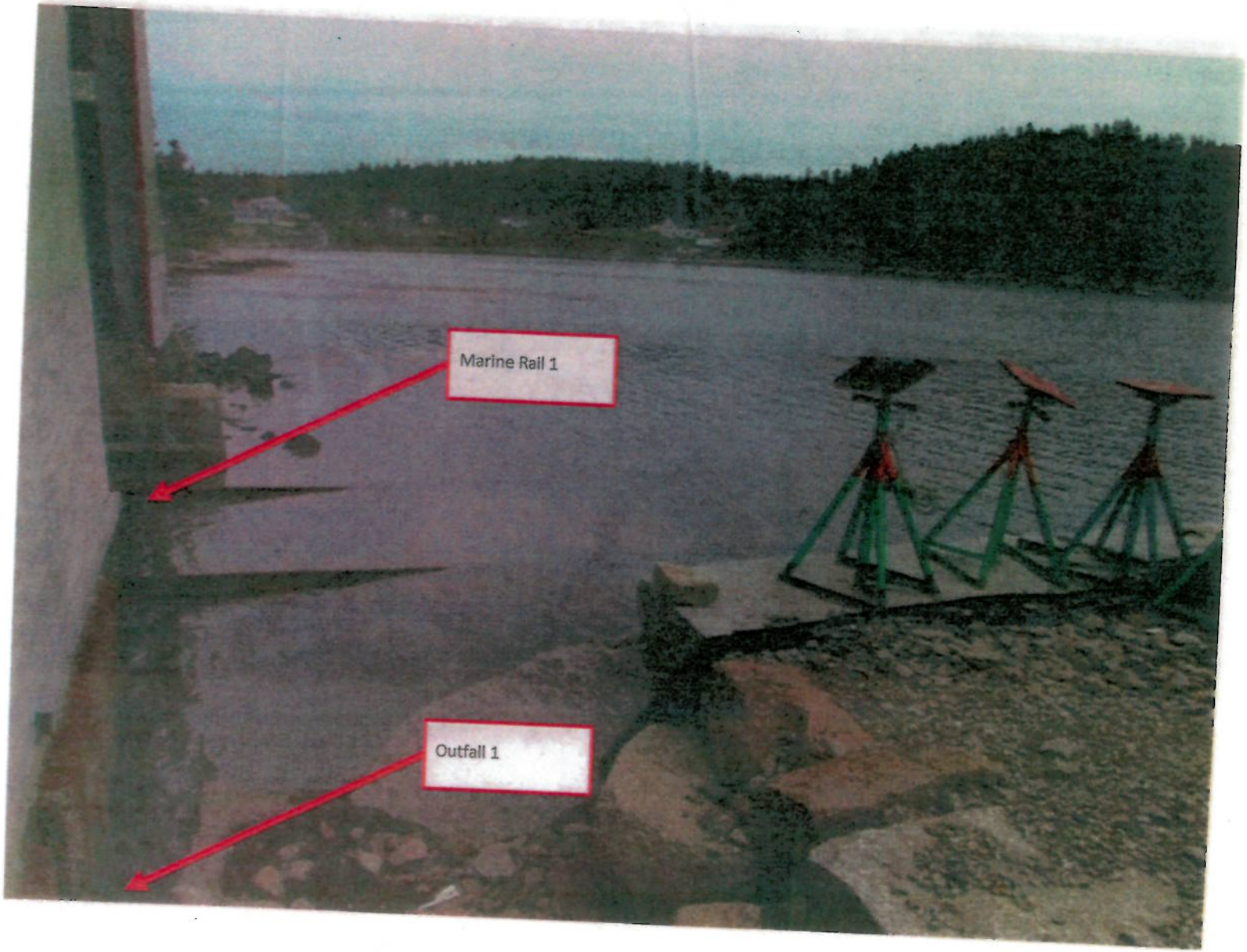

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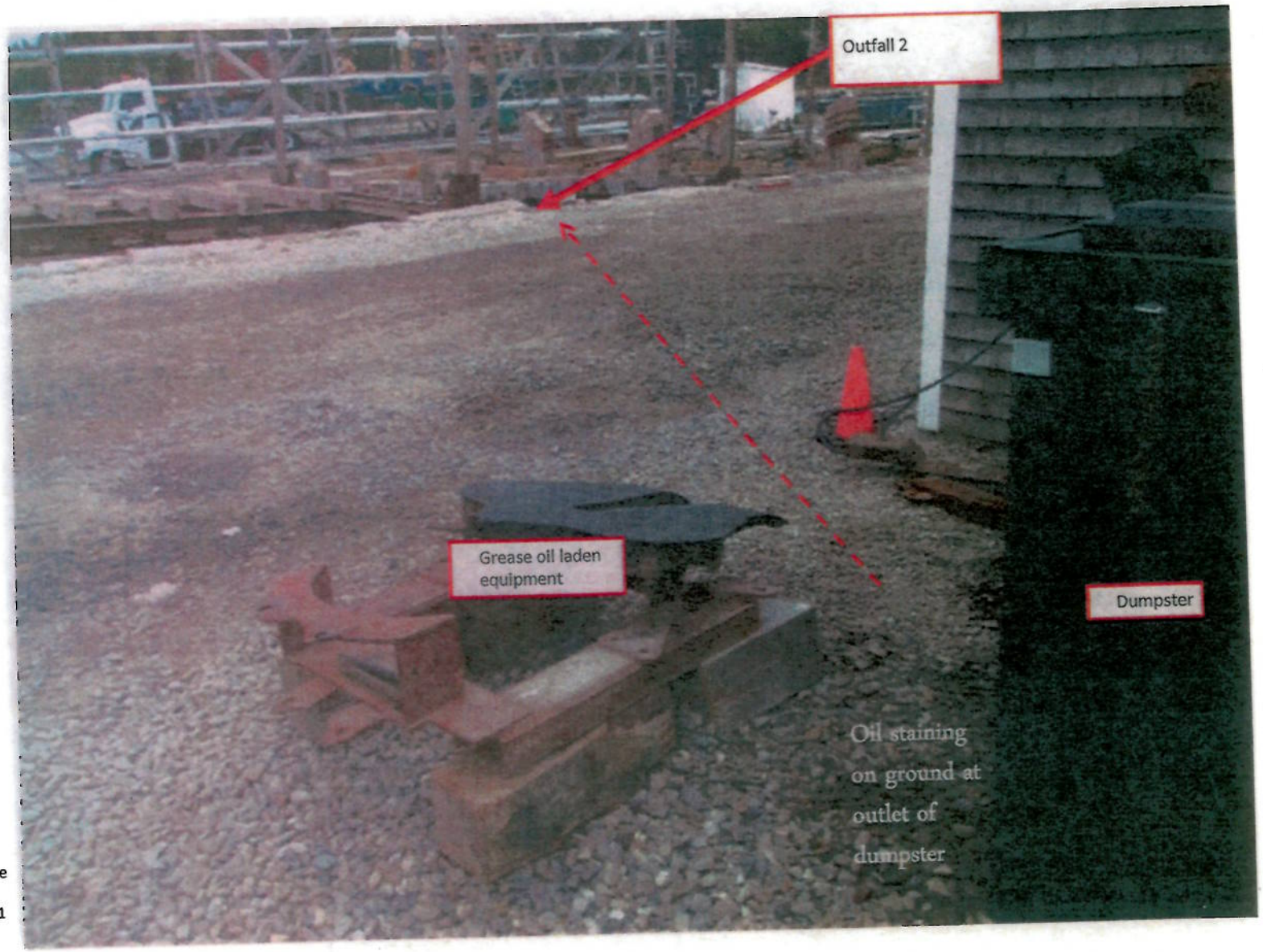

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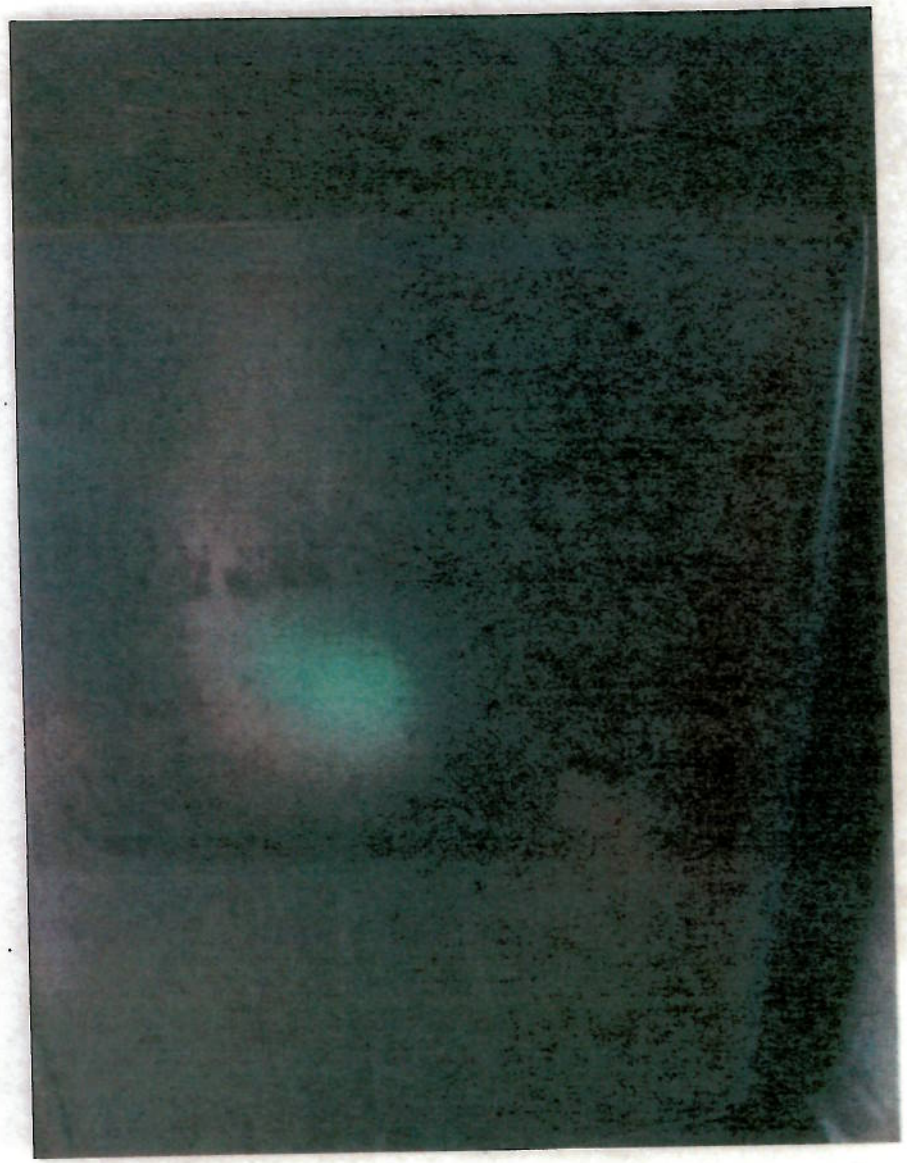

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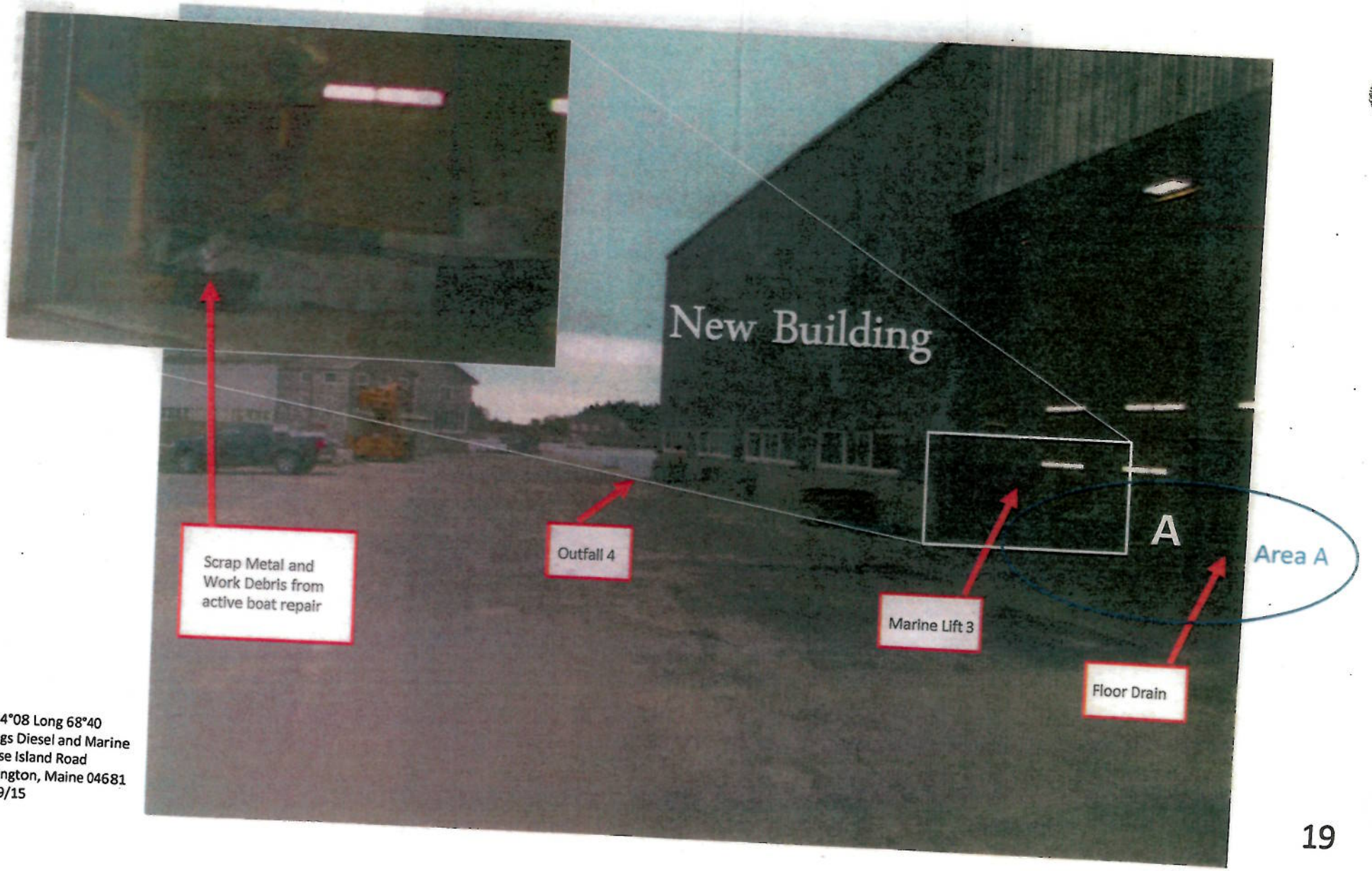

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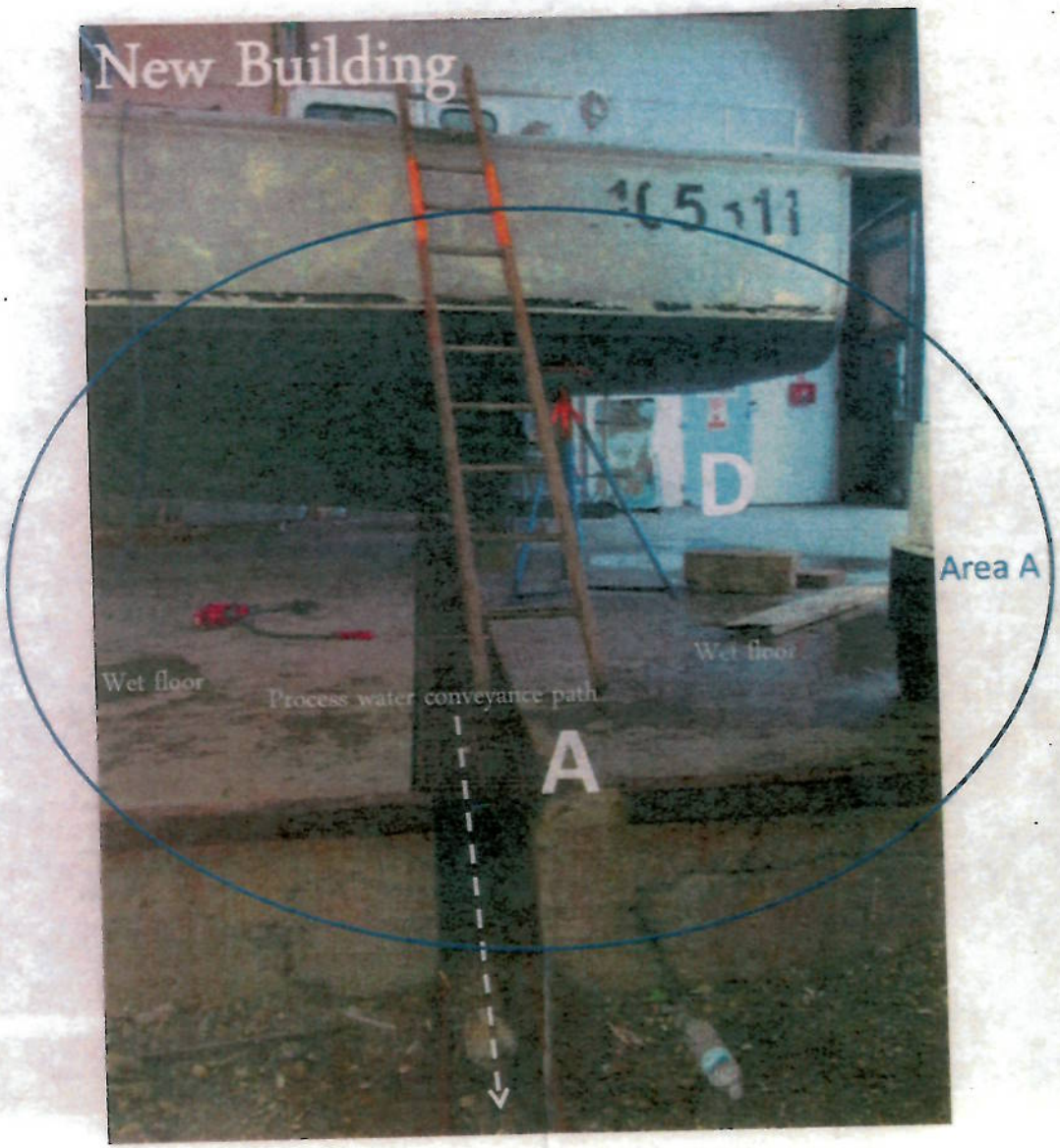

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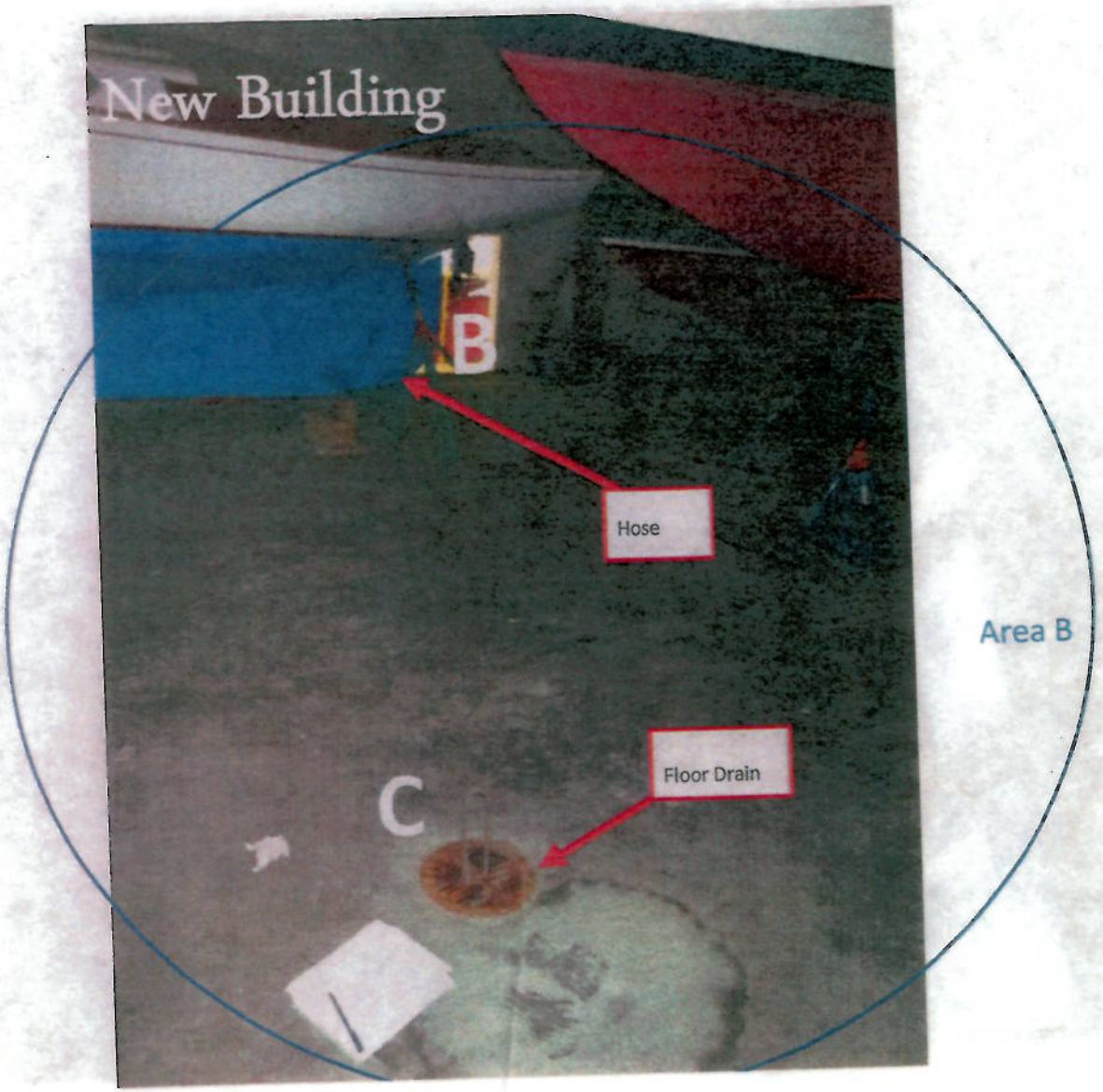

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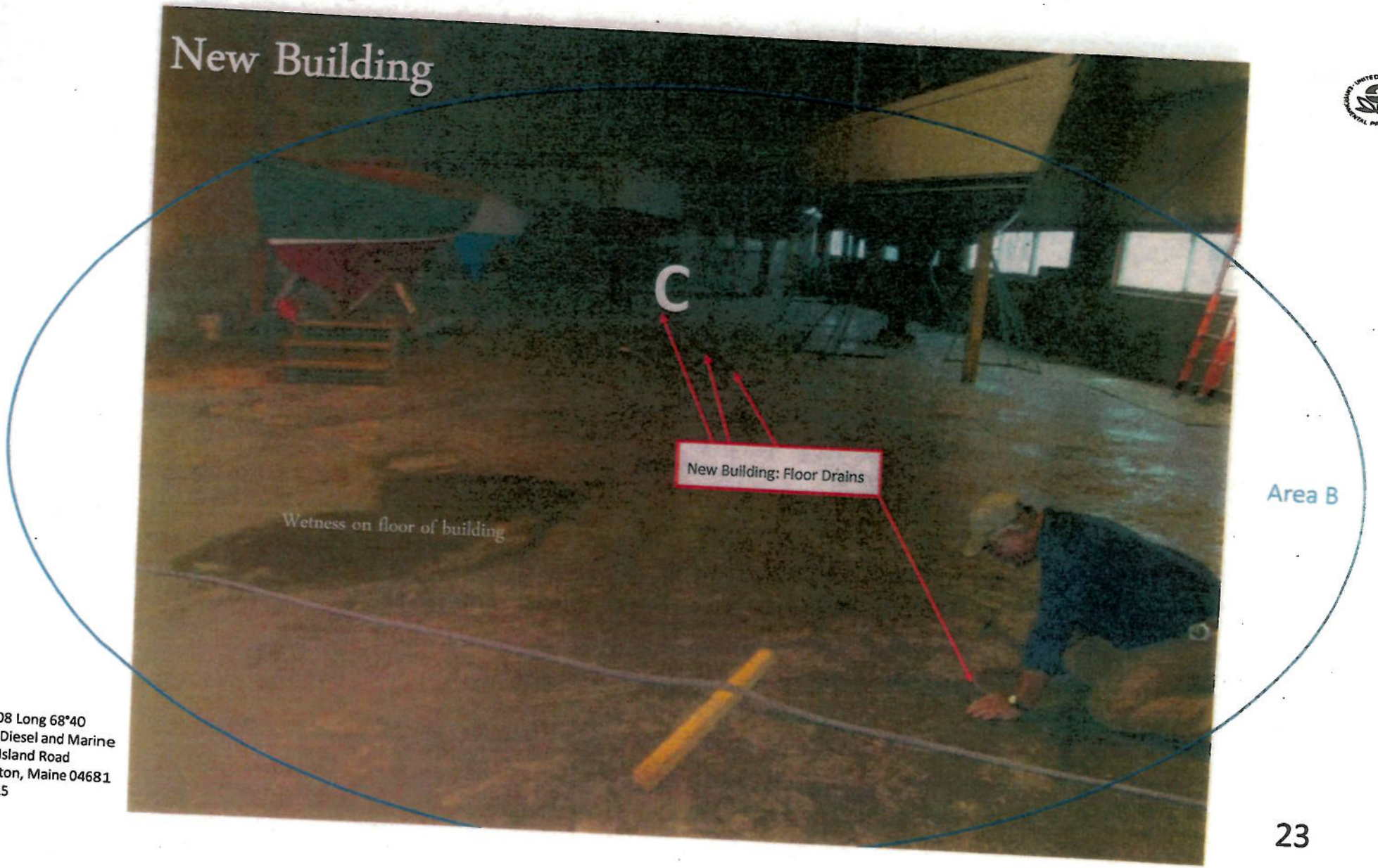

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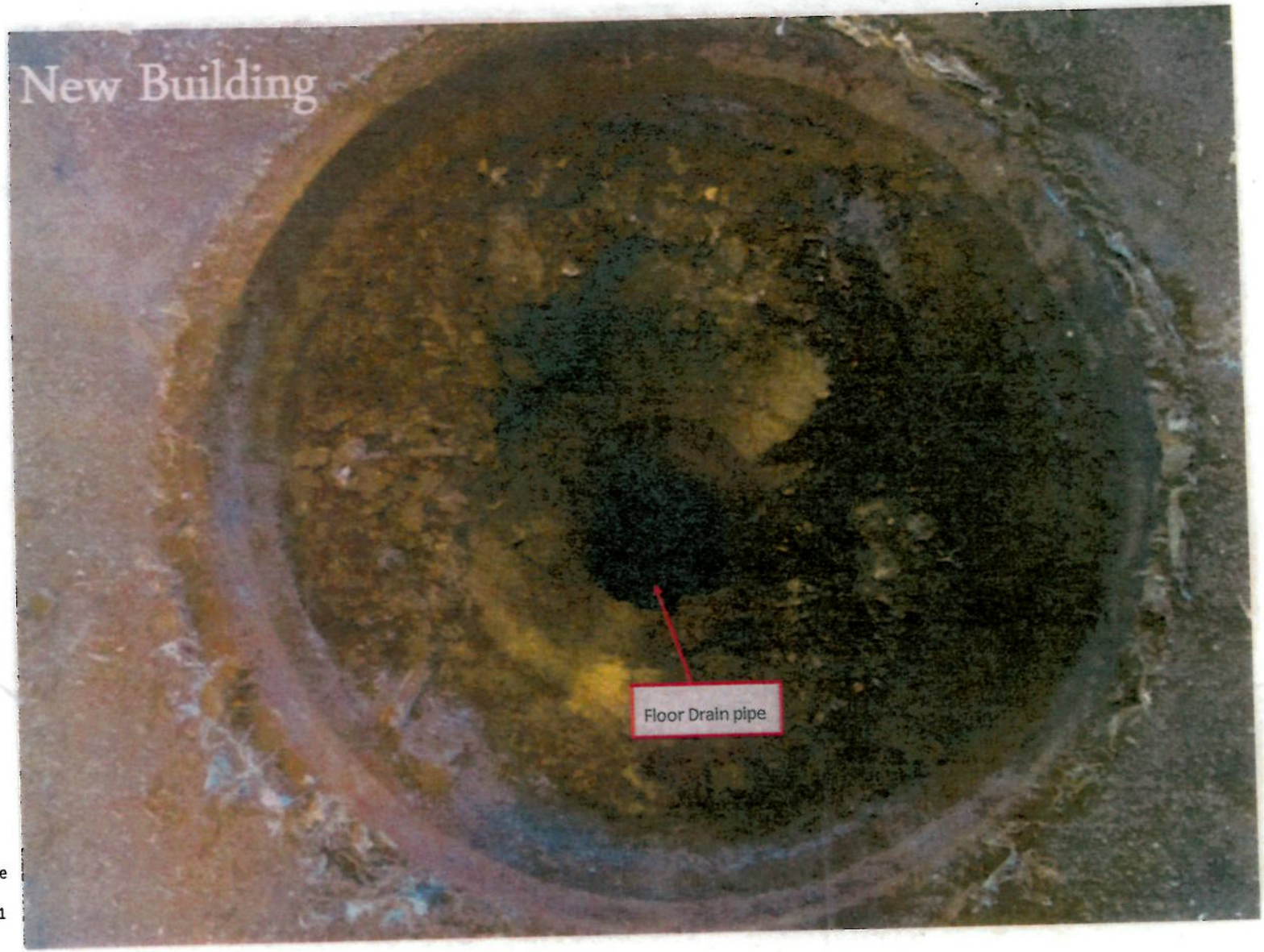

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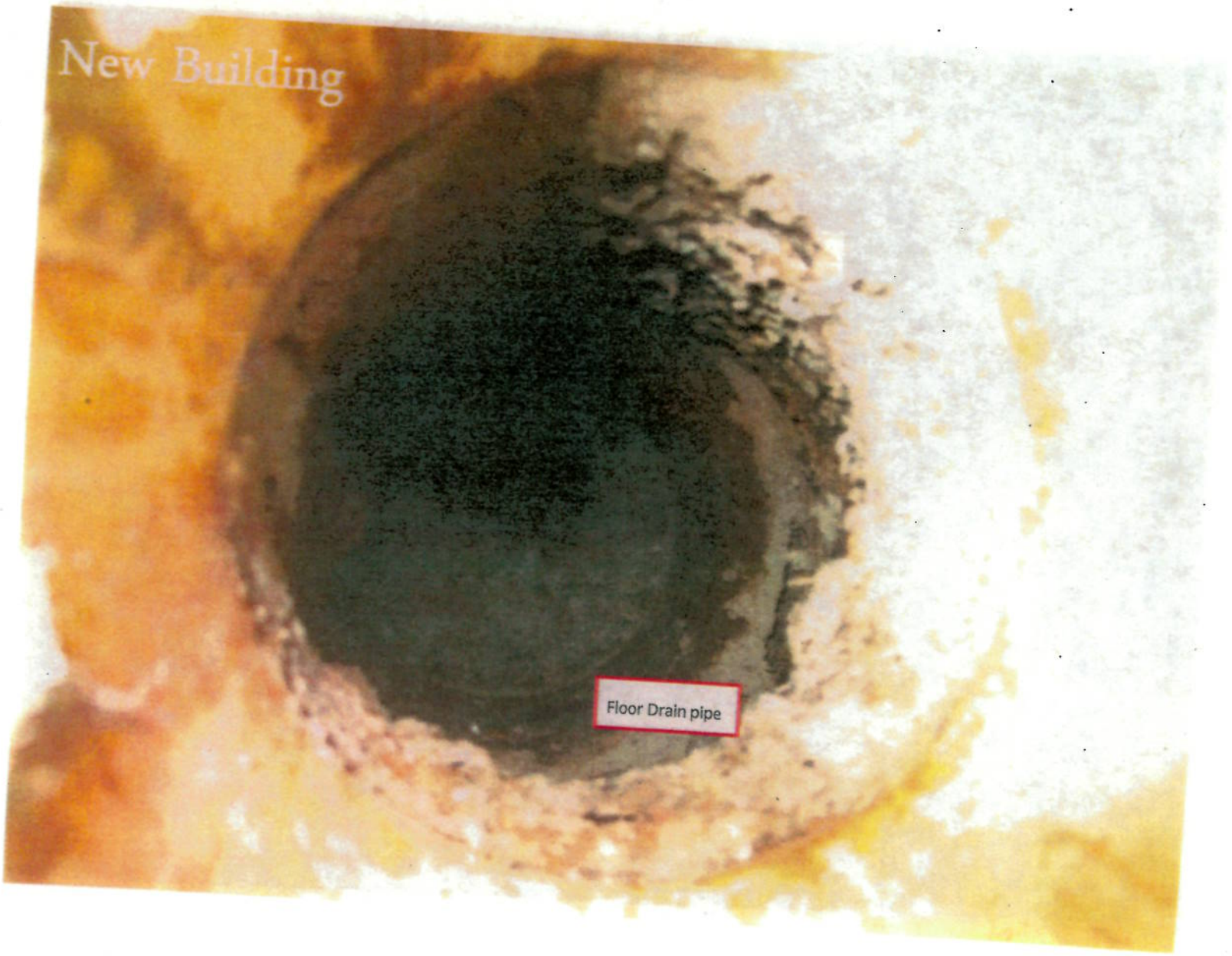

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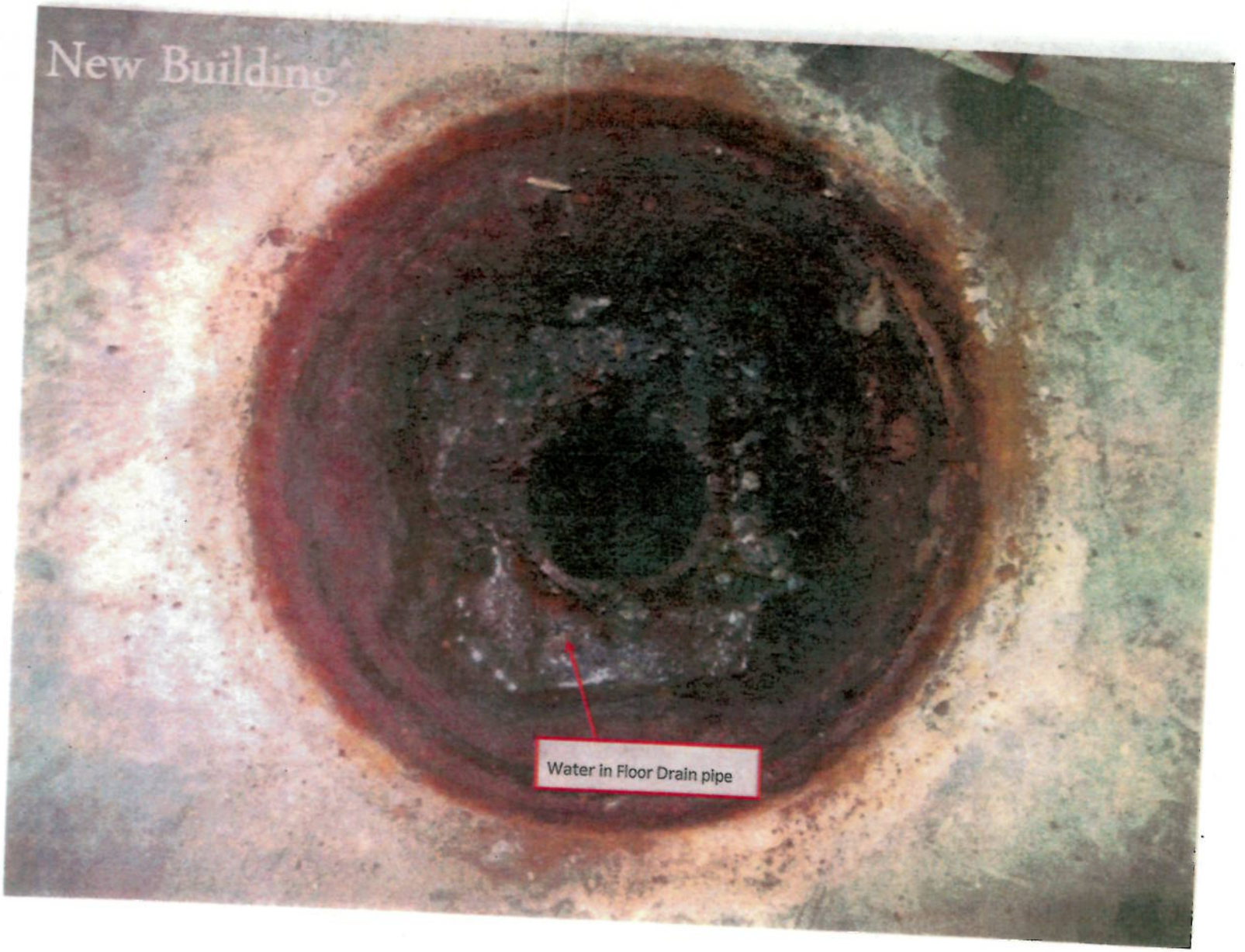

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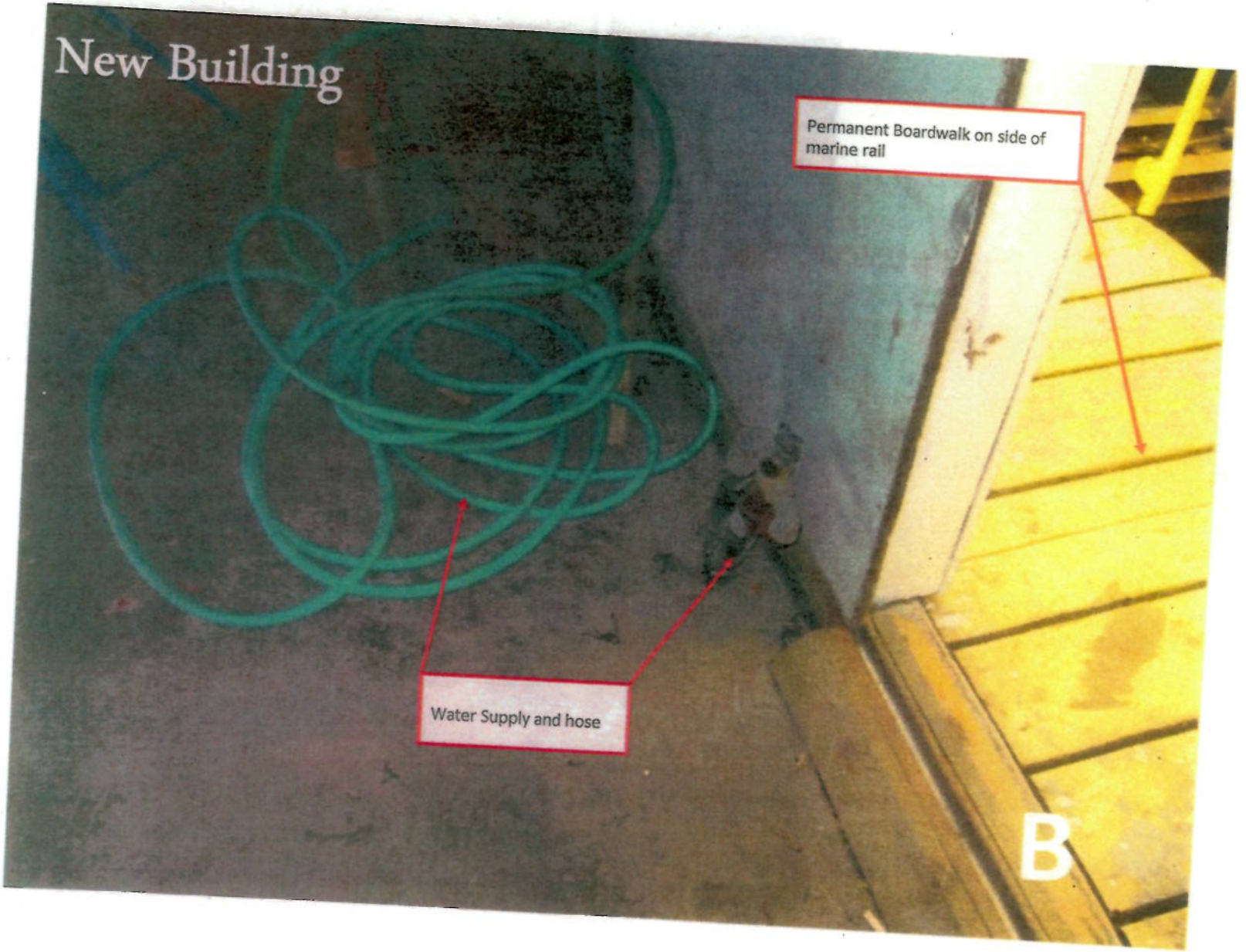

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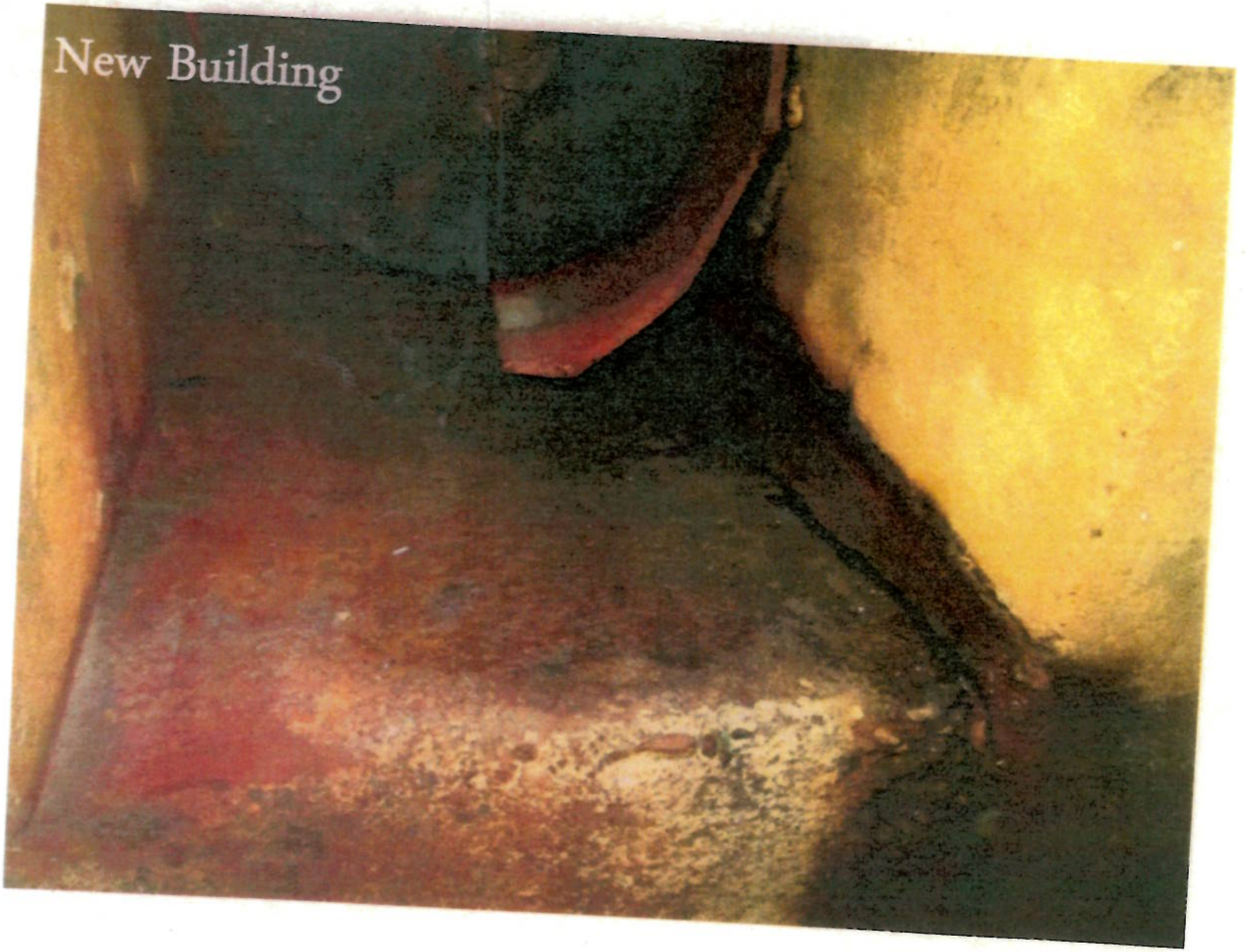

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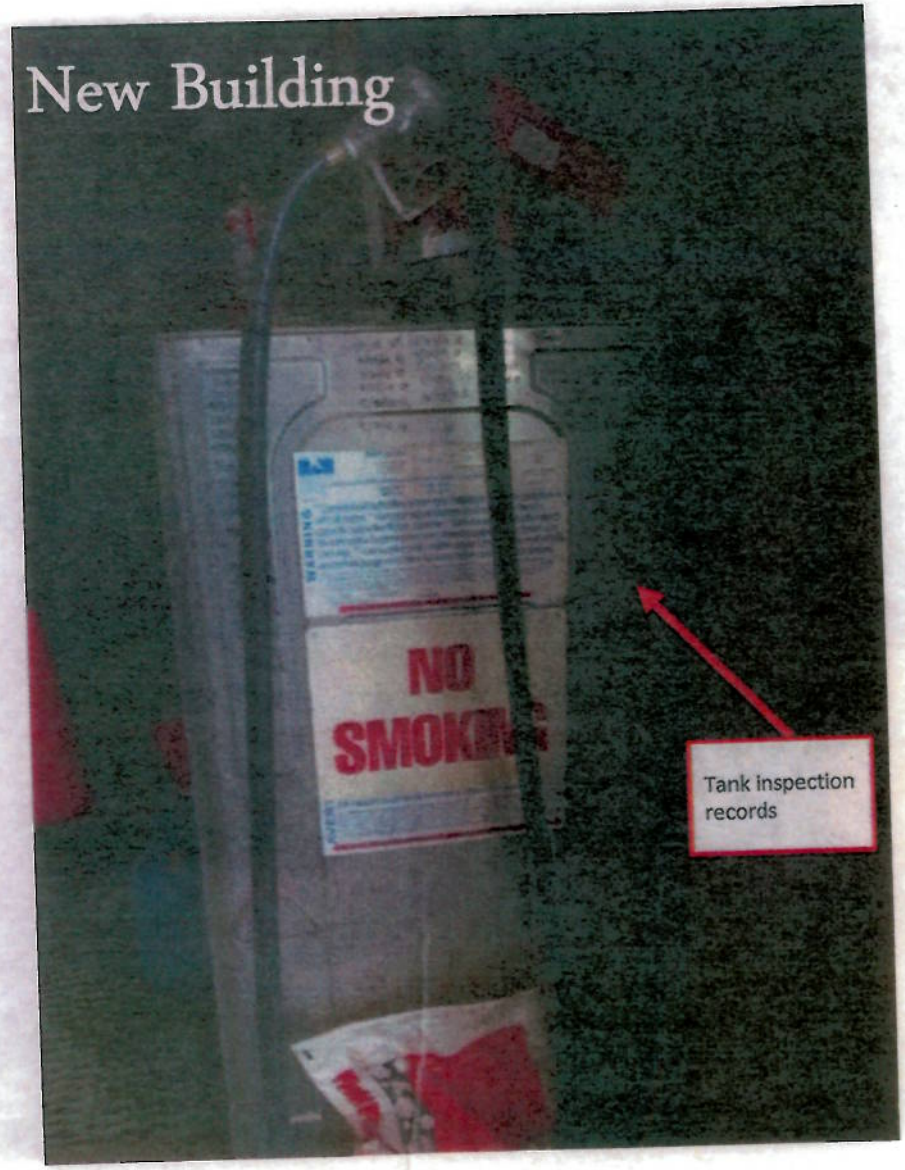

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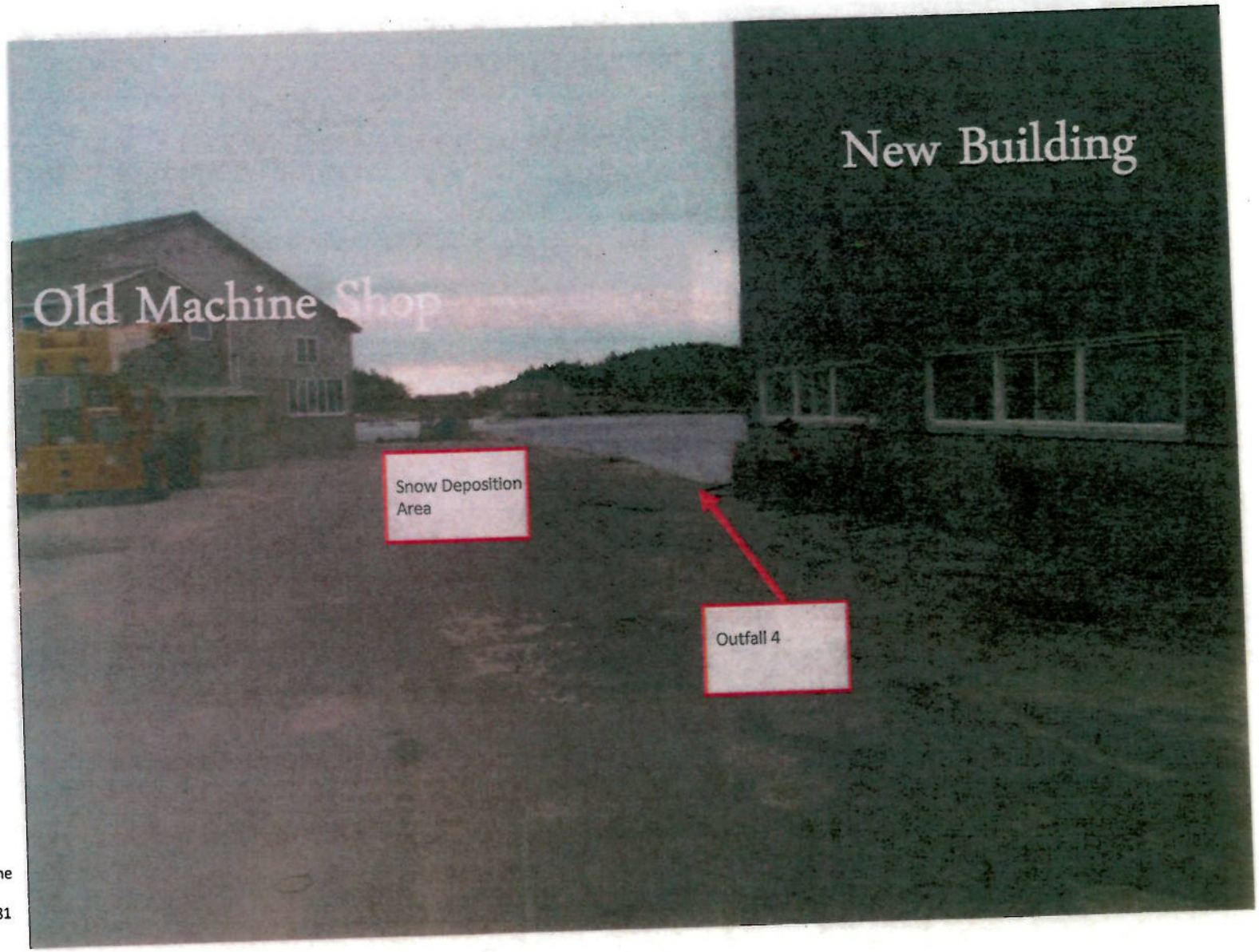

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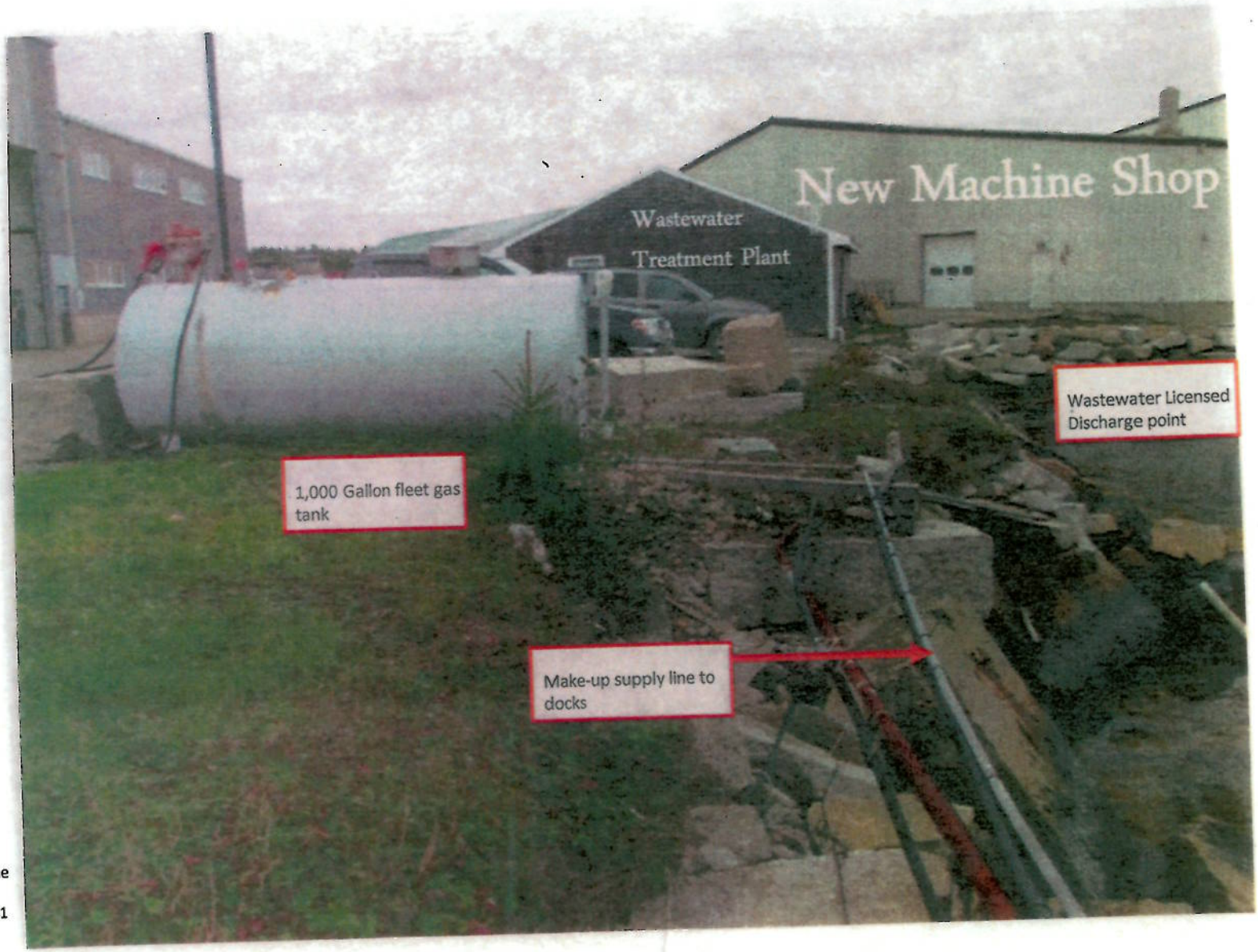

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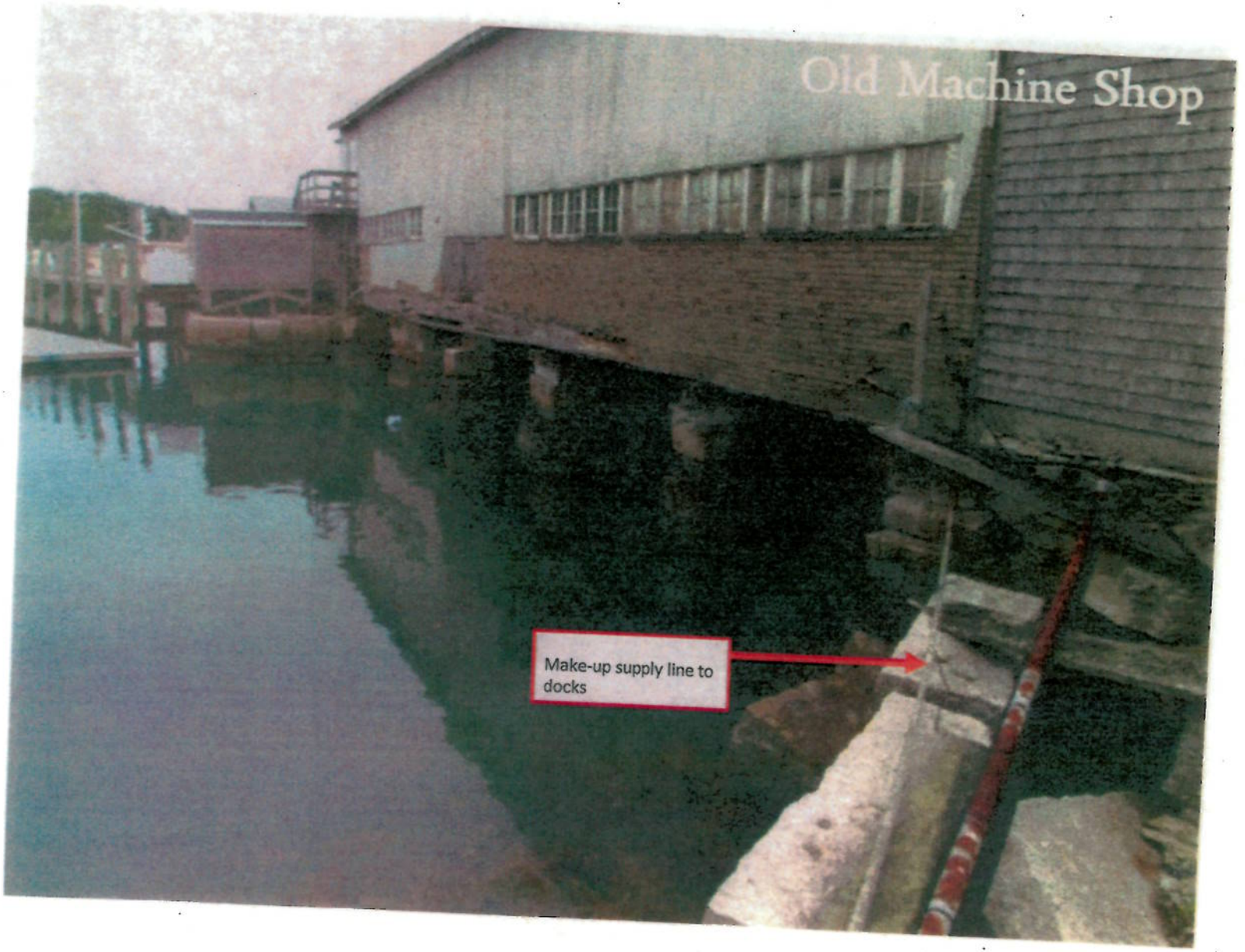

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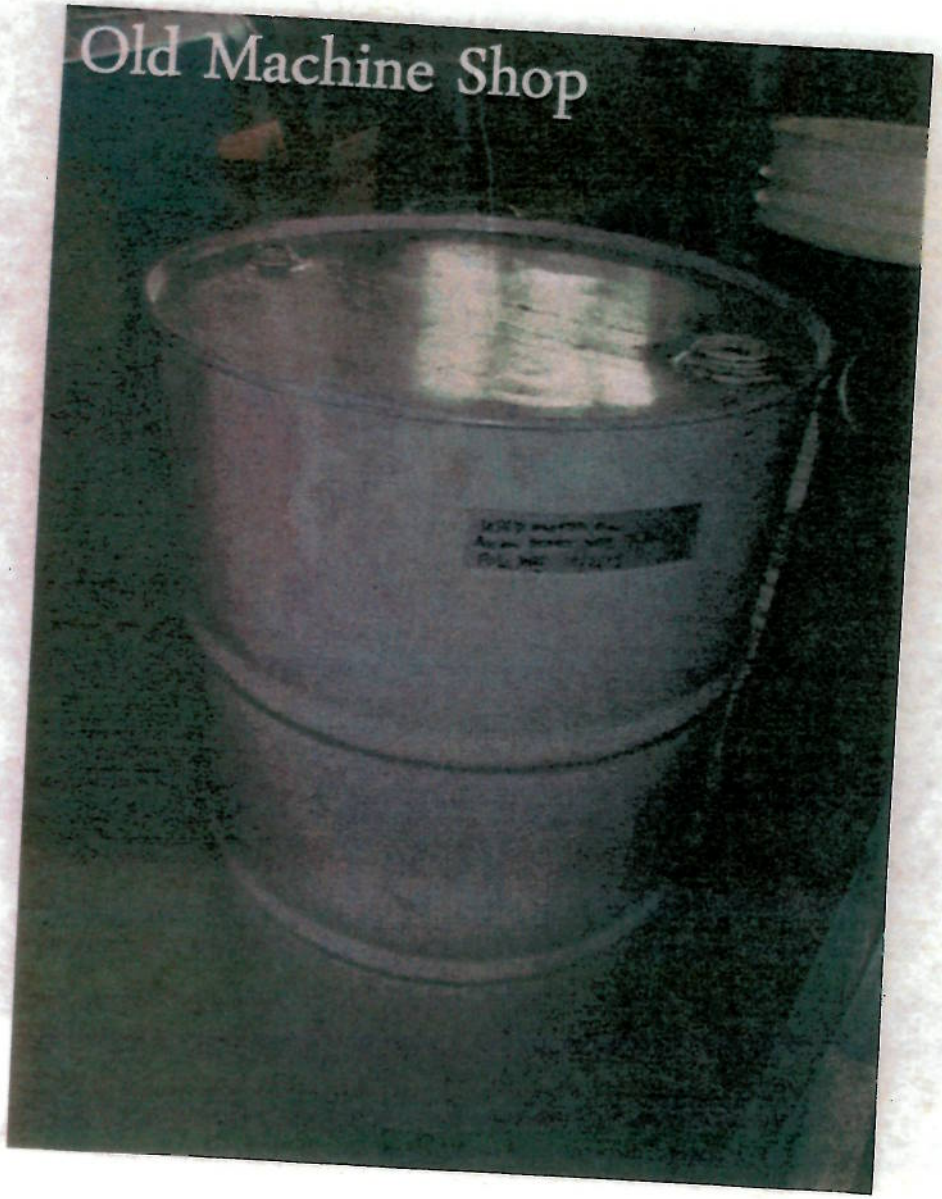

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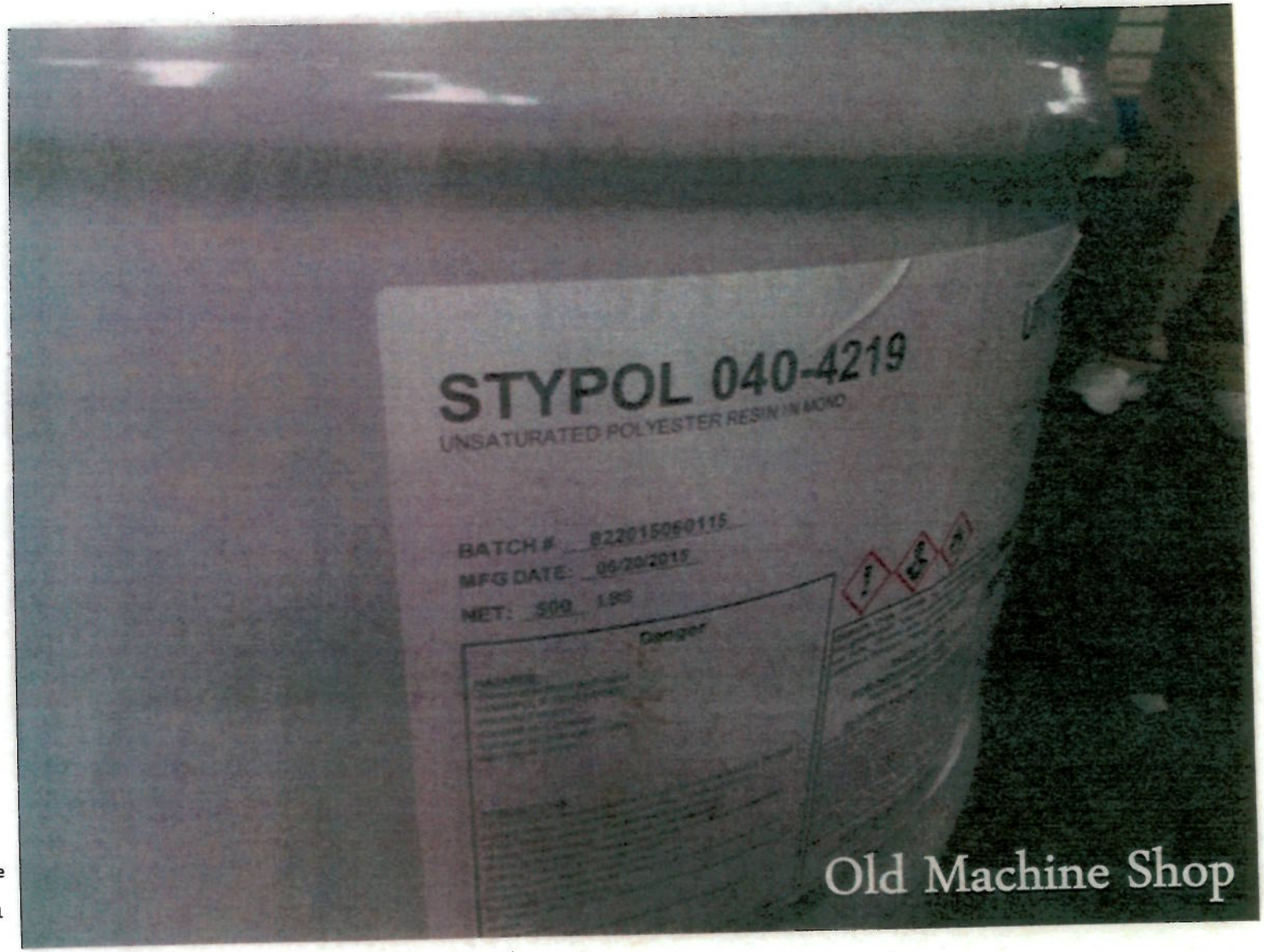

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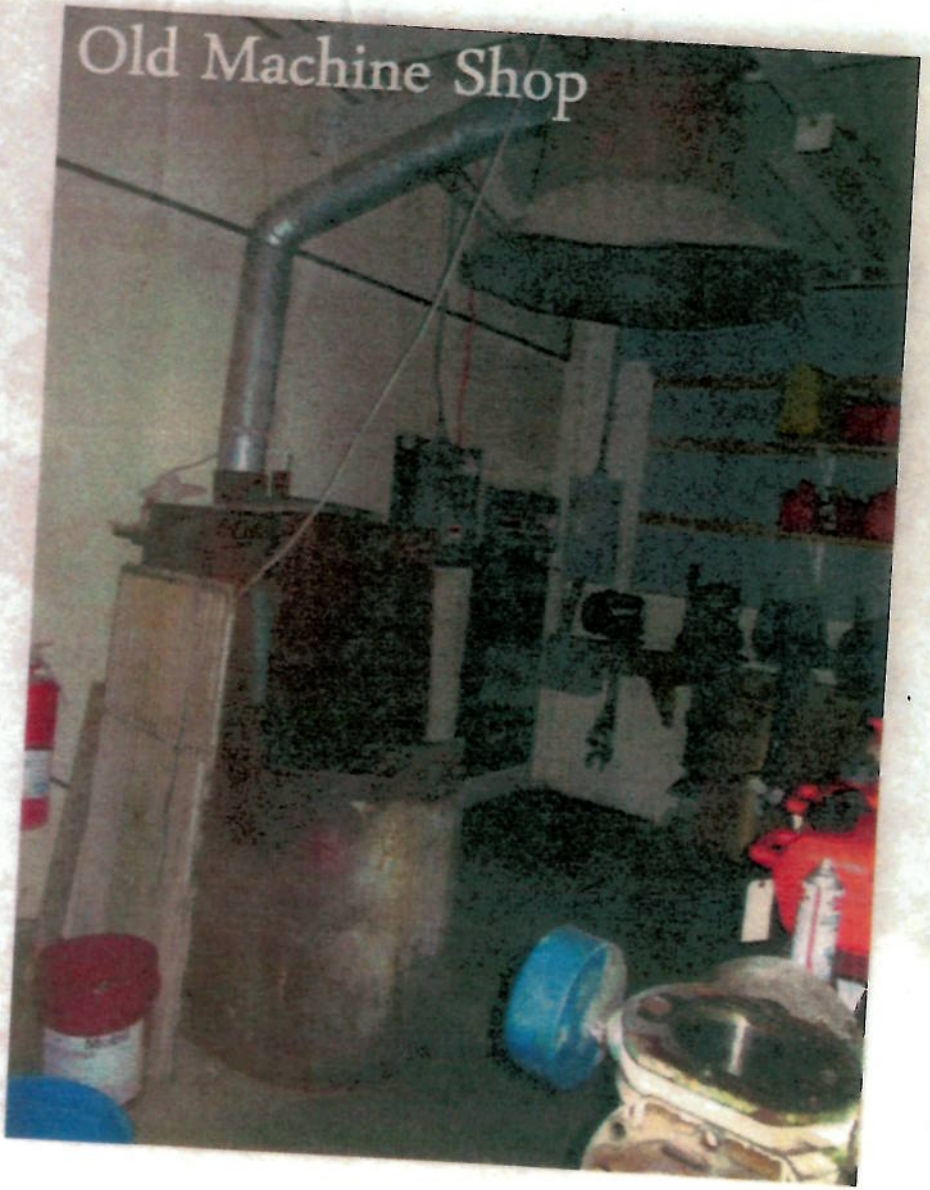

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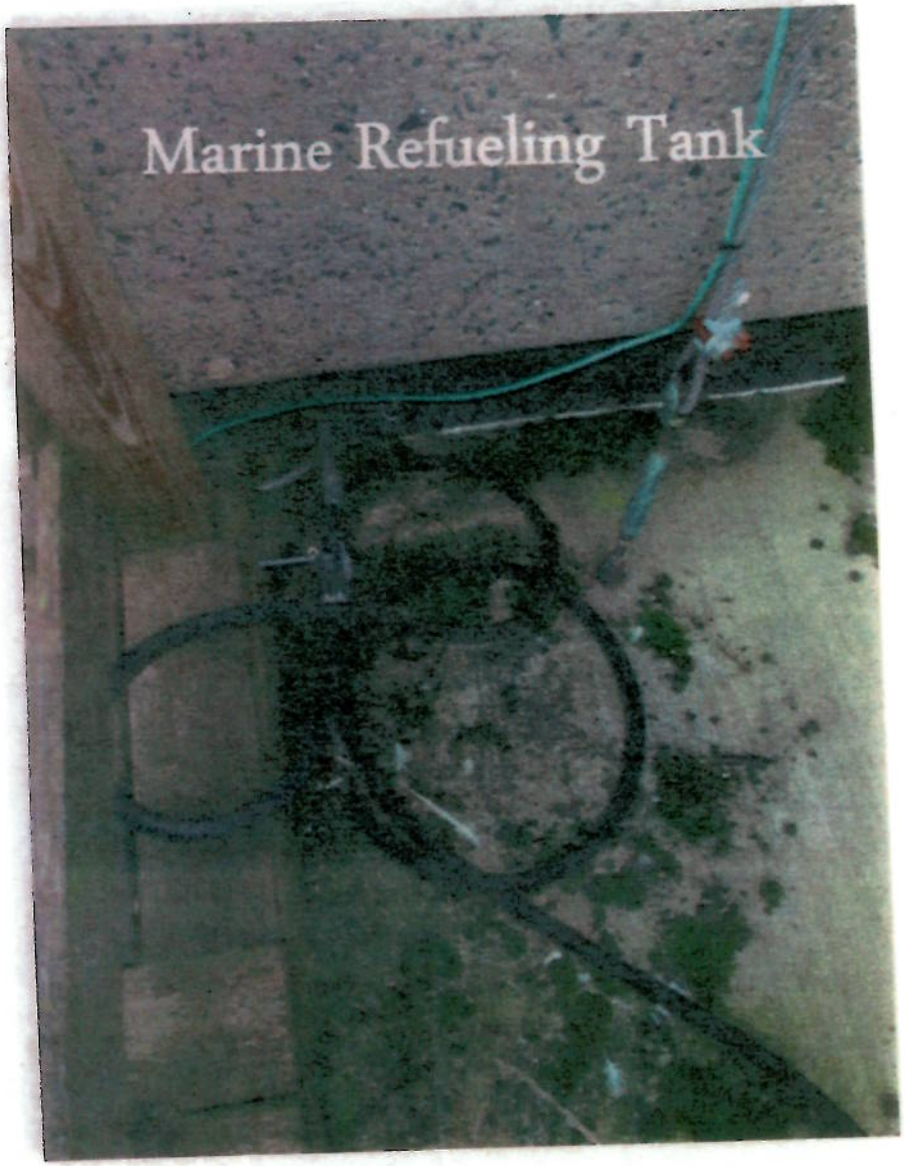

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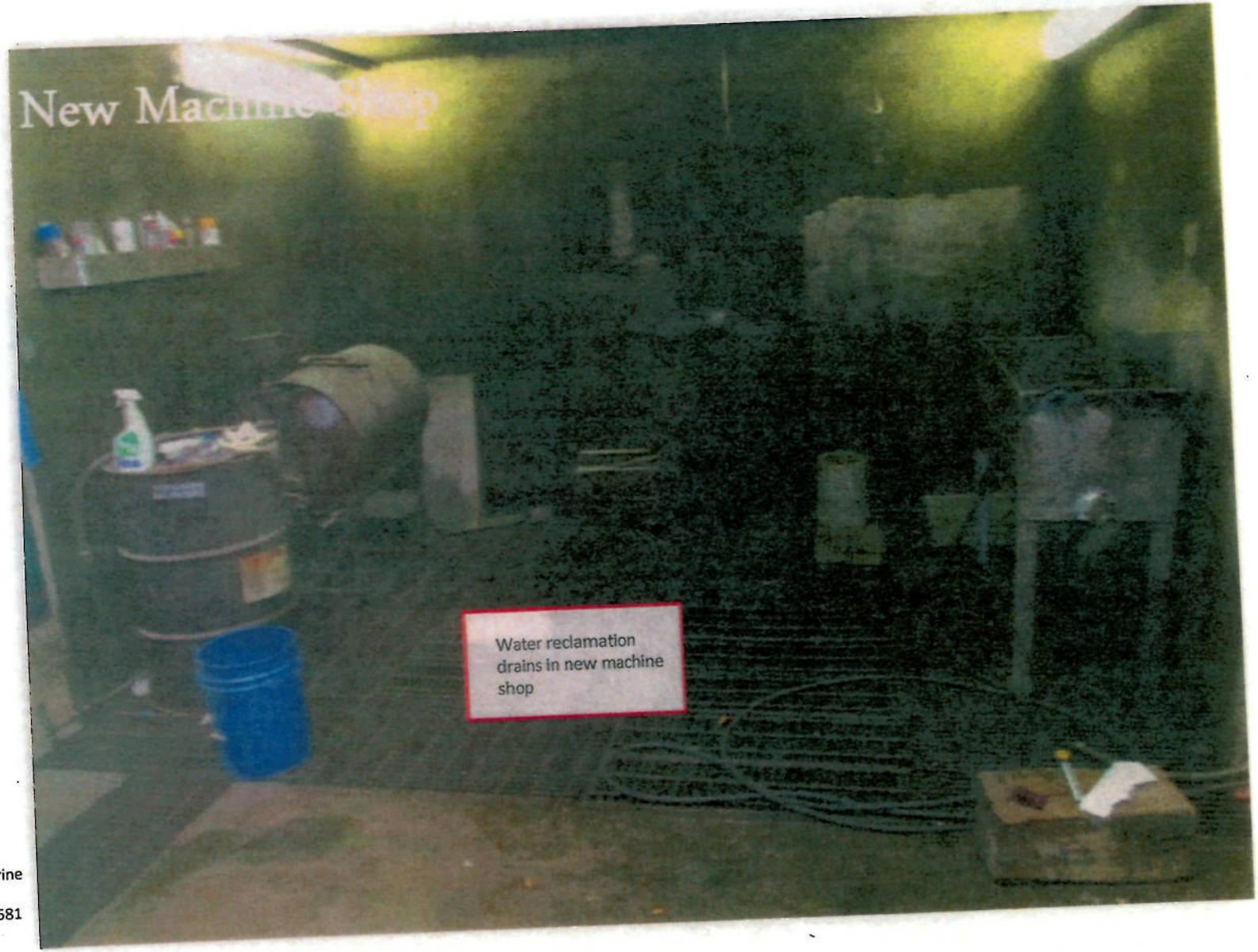

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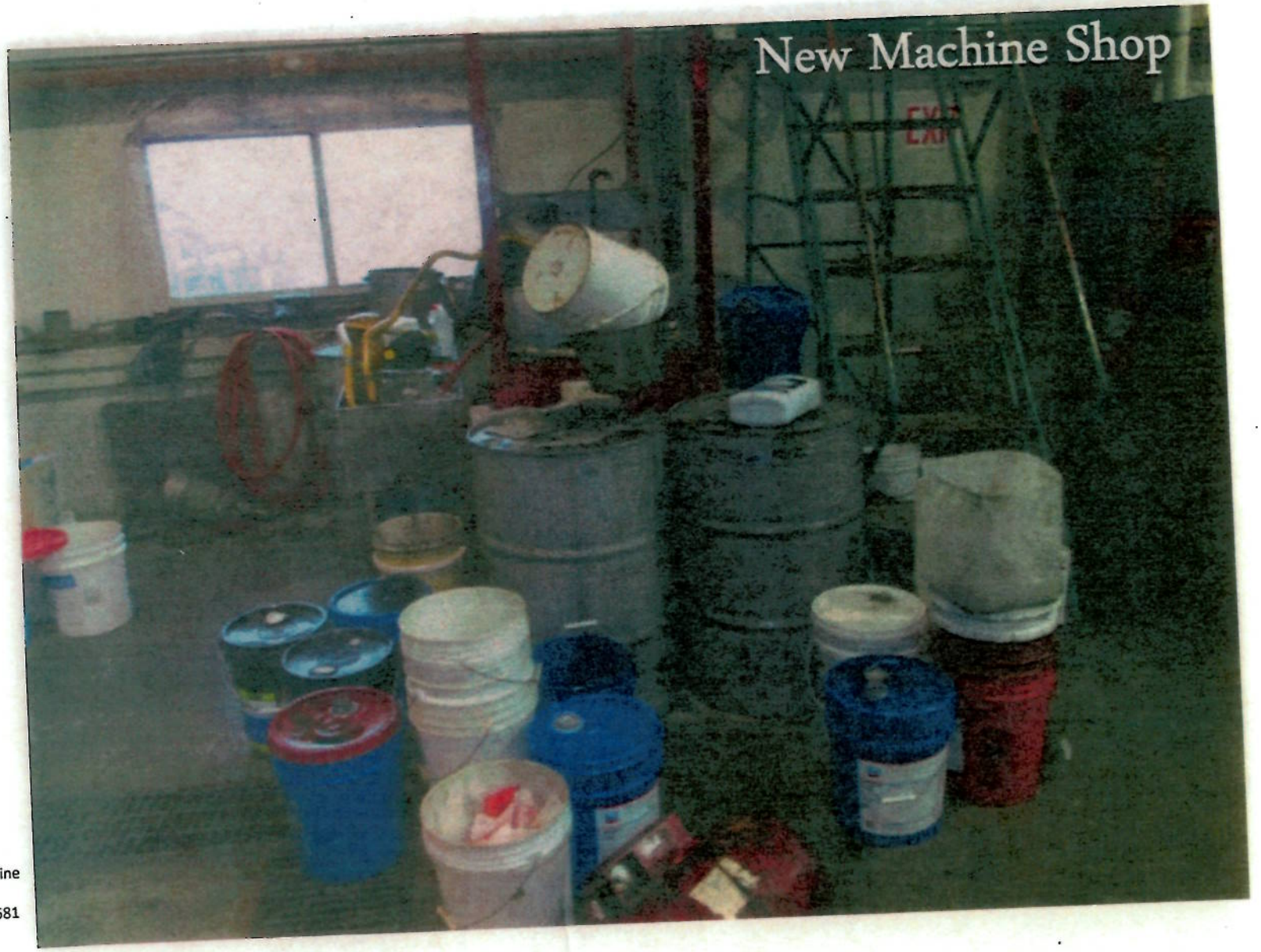

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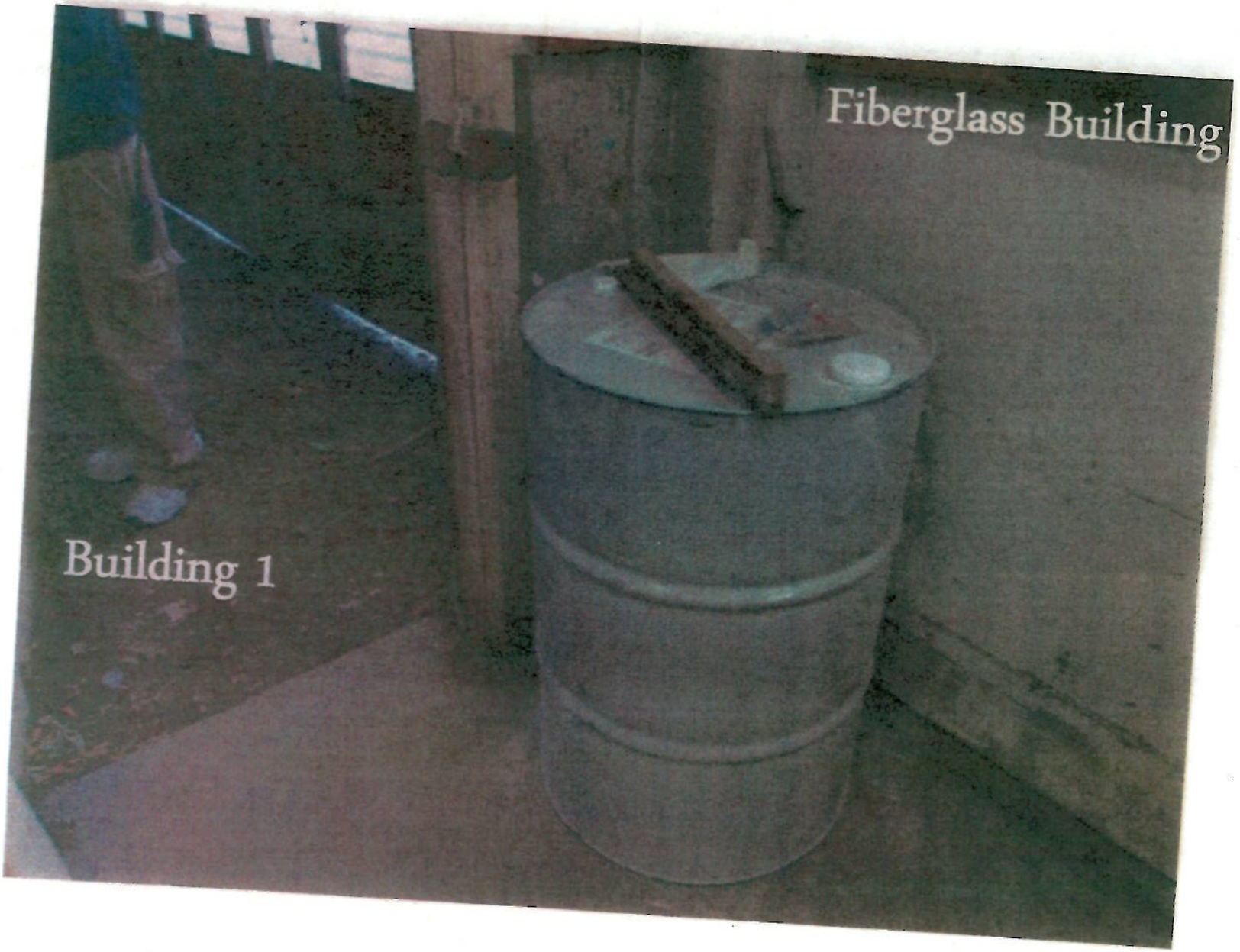

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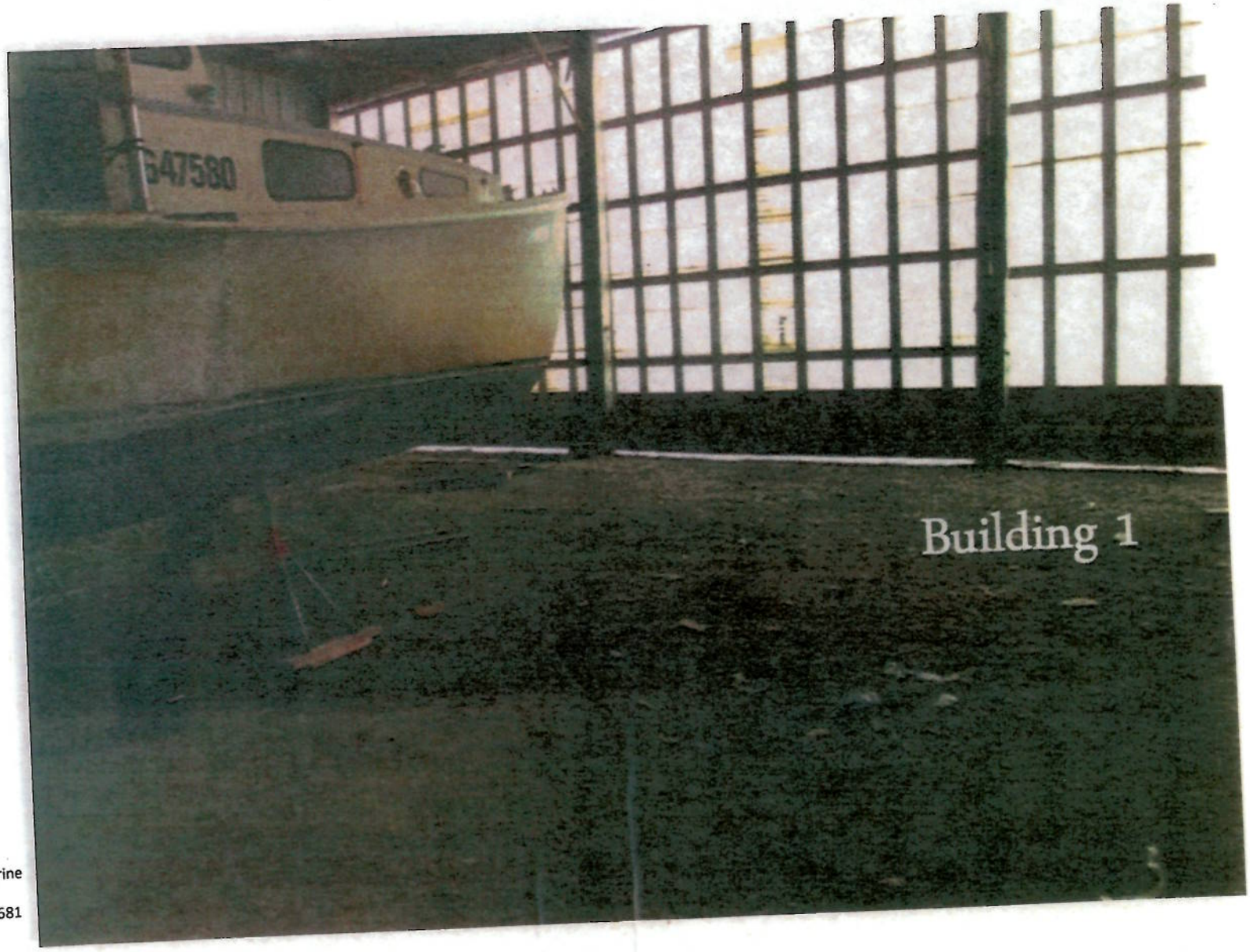

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Paint Shop
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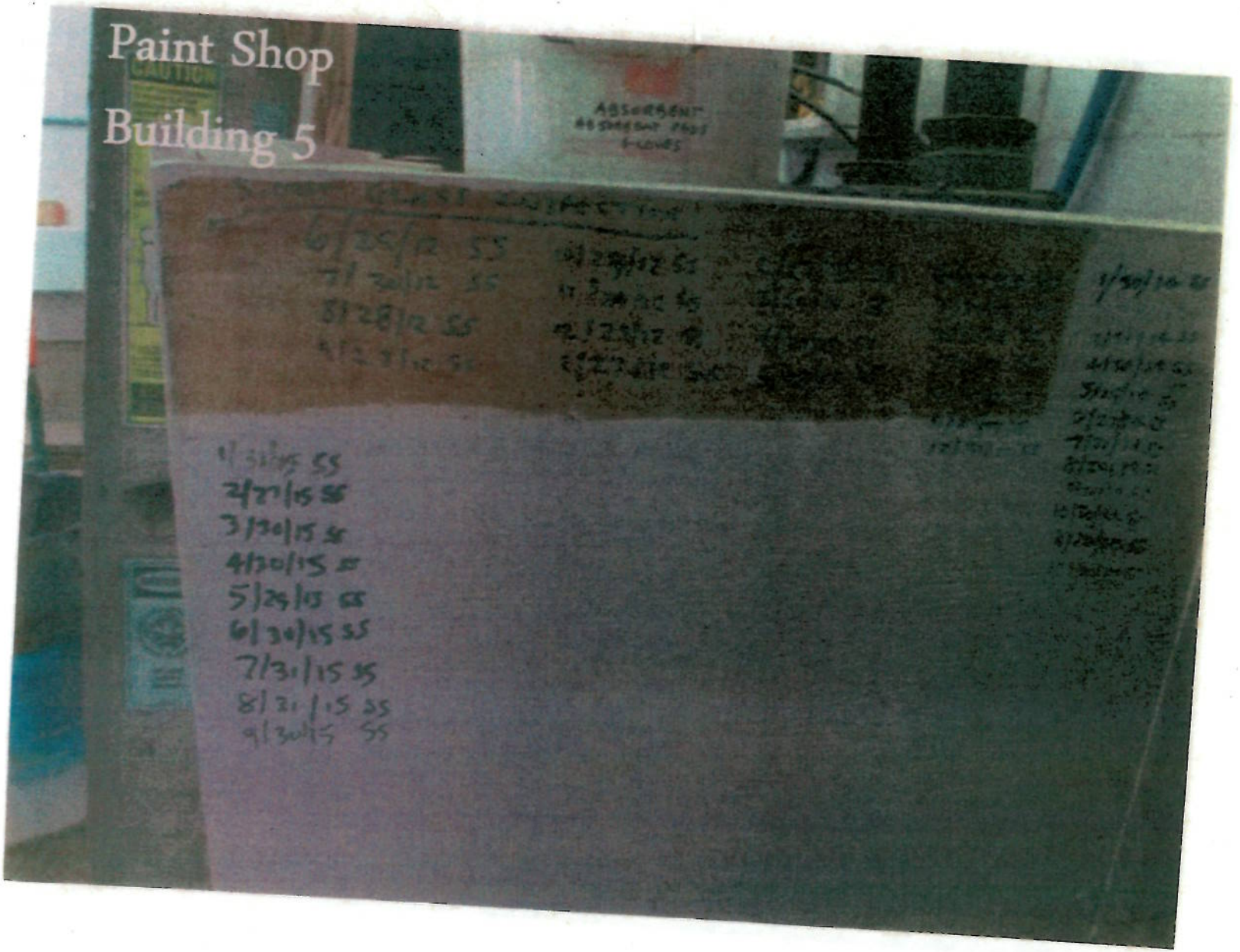

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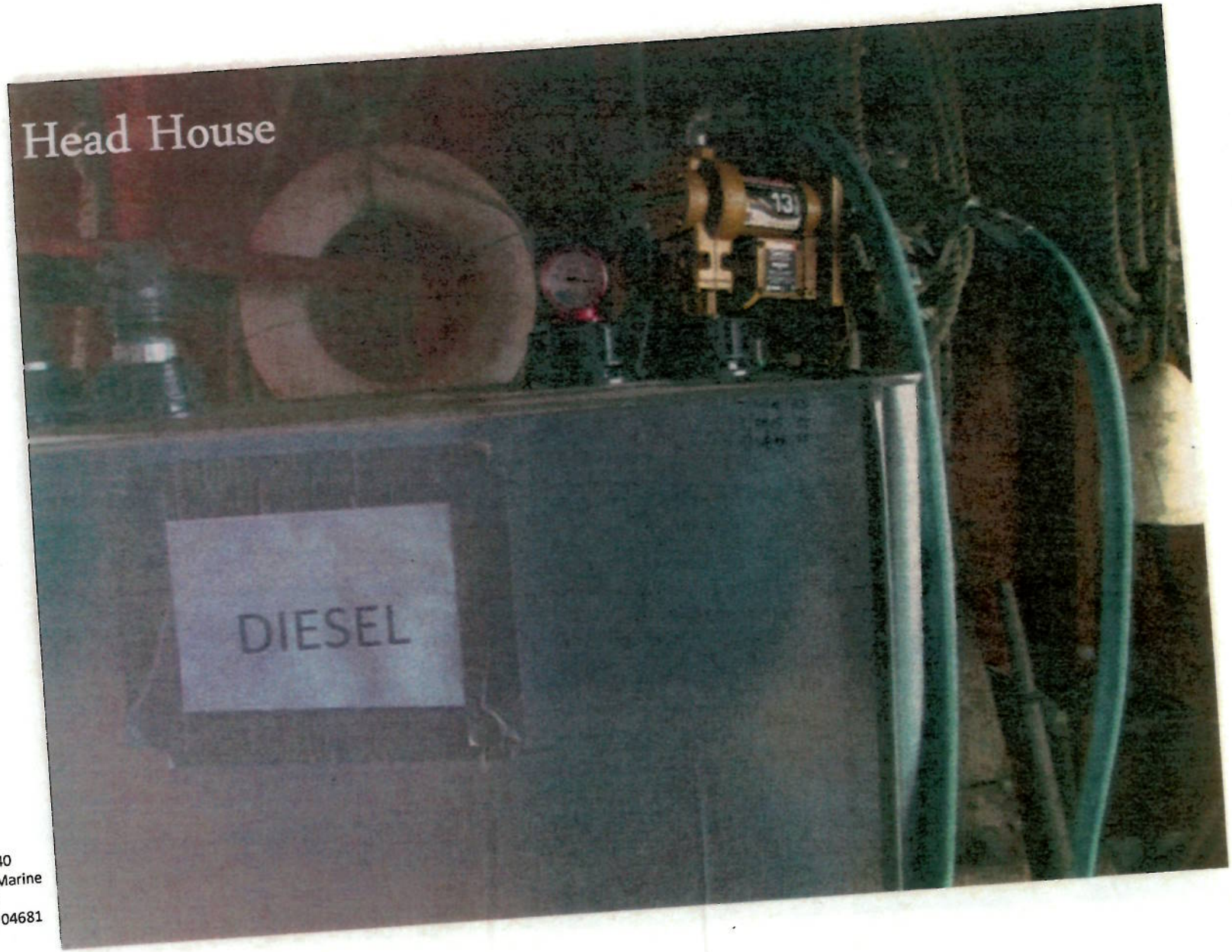

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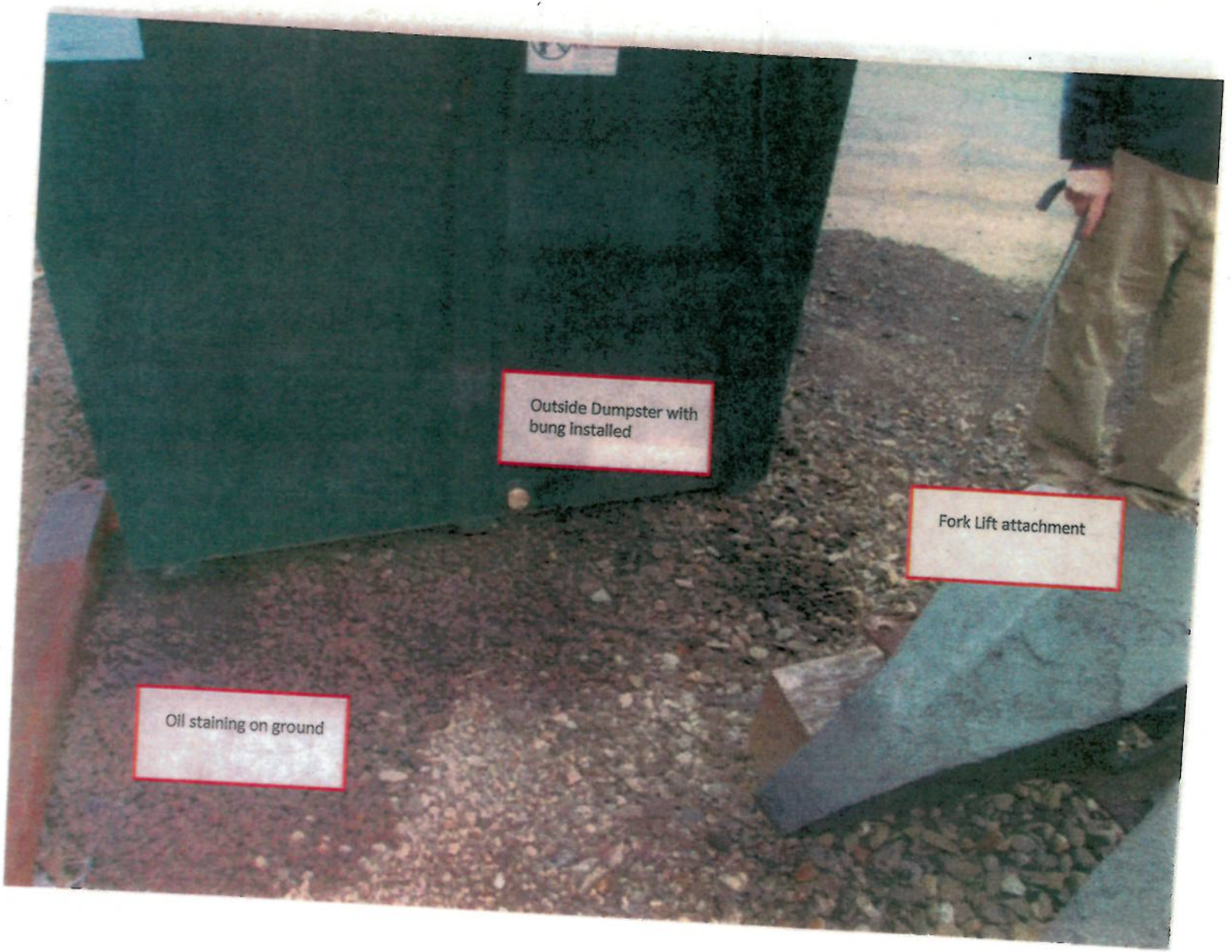

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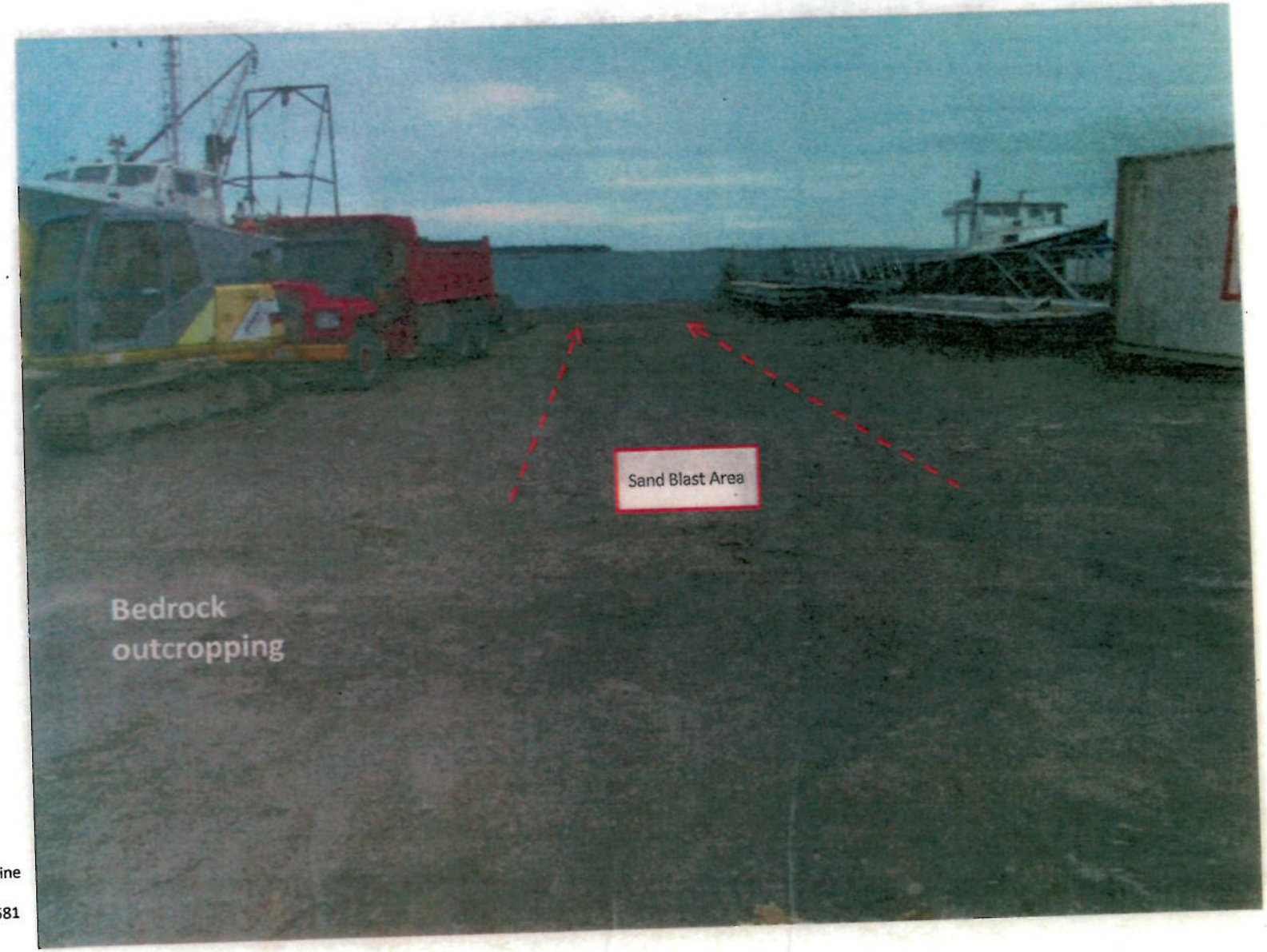

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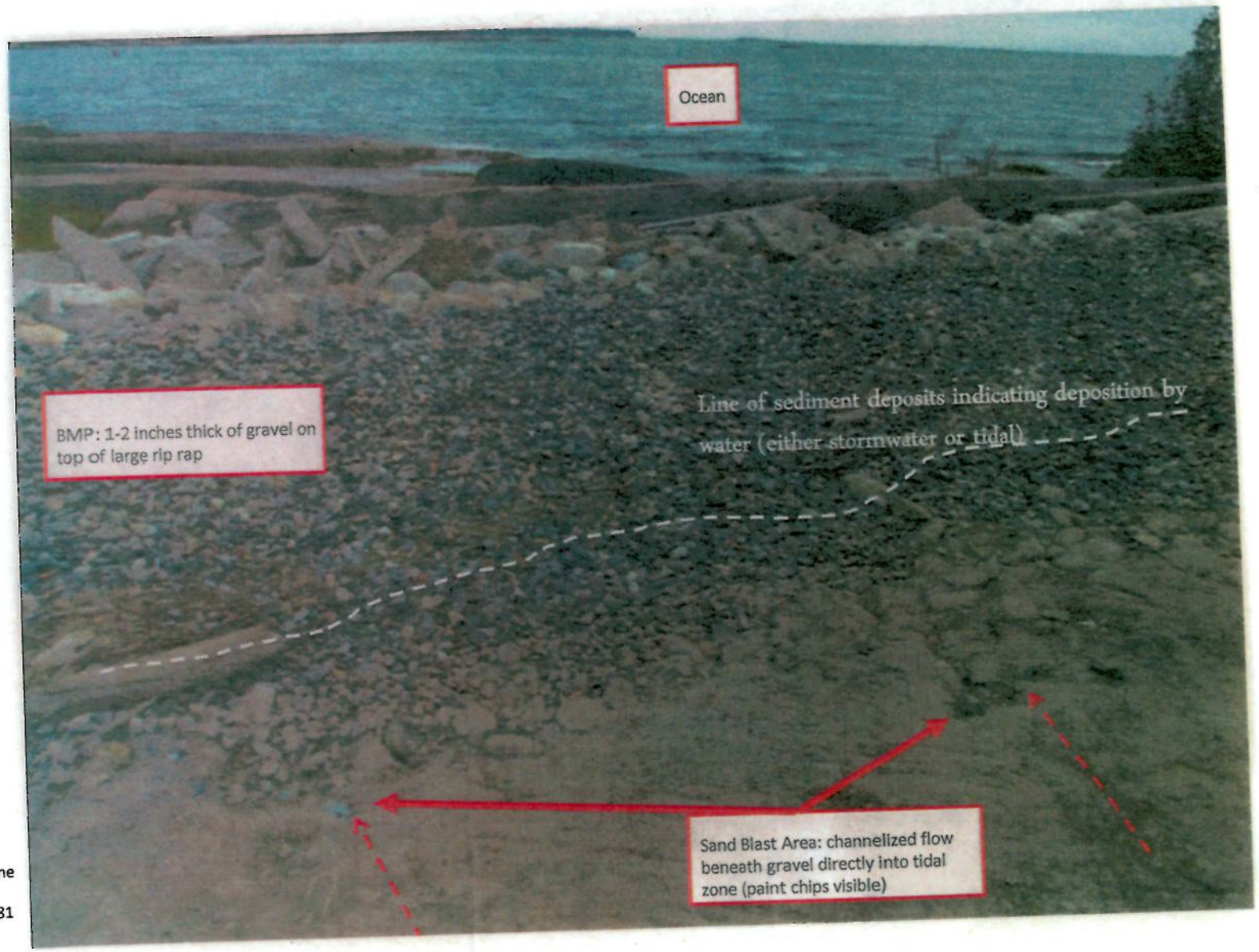

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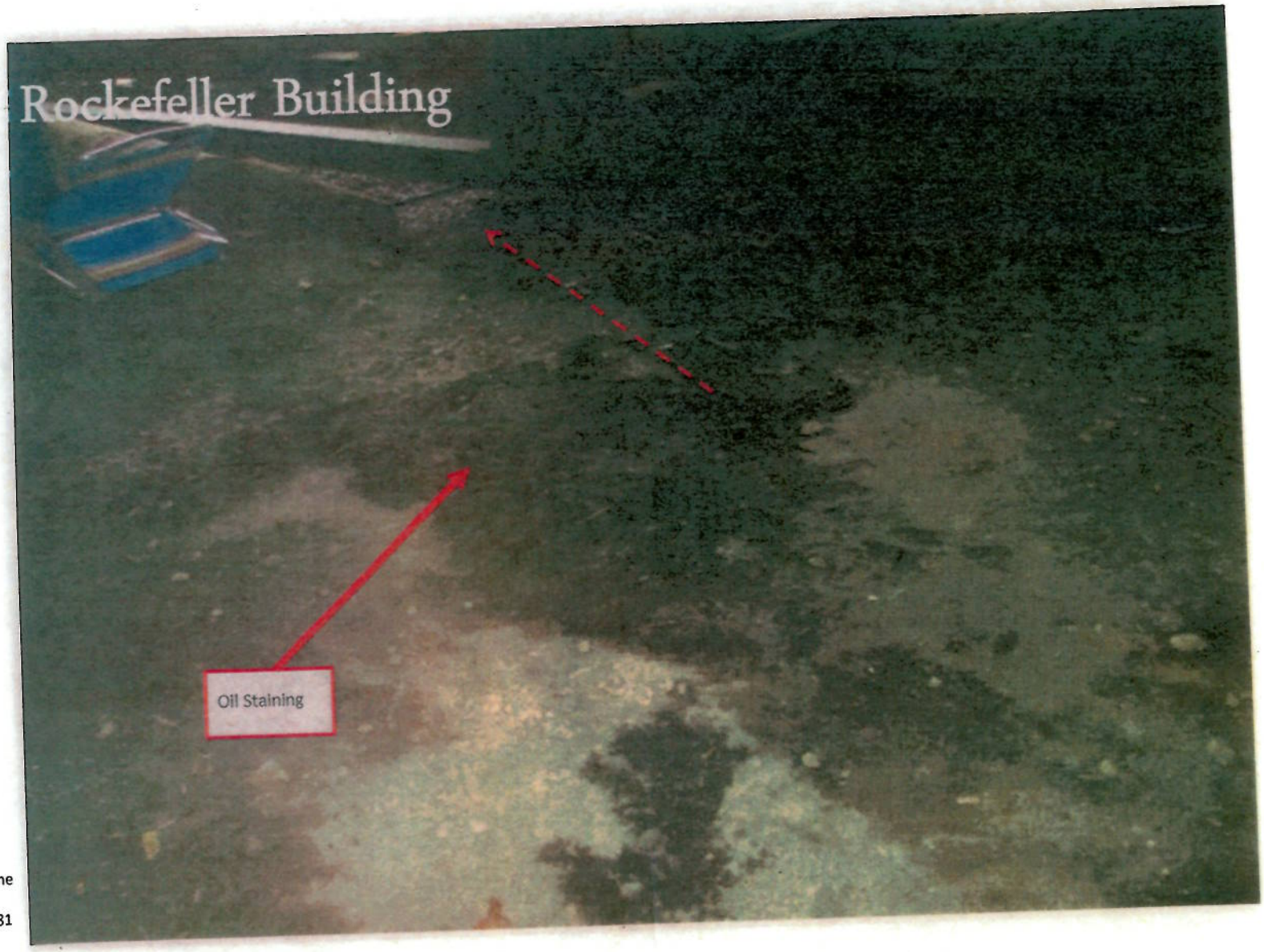

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